

Rebecca Terry vs County of Milwaukee, et al.

17-CV-01112

Transcript of the Testimony of:

**REBECCA TERRY**

June 01, 2018



IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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REBECCA TERRY,

Plaintiff,

vs.

Case No. 17-CV-01112

COUNTY OF MILWAUKEE, et al.,

Defendants.

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Videotaped Deposition of REBECCA TERRY

Friday, June 1, 2018

12:00 p.m.

at

LEIB KNOTT GAYNOR LLC  
219 North Milwaukee Street, Suite 710  
Milwaukee, Wisconsin

Reported by Carla J. Van Roo, RPR, CRR

Videotaped Deposition of REBECCA TERRY, a witness in the above-entitled action, at the instance of the Defendants, pursuant to the rules of Federal Procedure, before Carla J. Van Roo, Registered Professional Reporter and Certified Realtime Reporter, in and for the State of Wisconsin, at the aforementioned location noted on previous page, held on June 1, 2018, commencing at 12:00 p.m. and concluding at 6:45 p.m.

A P P E A R A N C E S:

LOEVY & LOEVY

MS. THERESA KLEINHAUS

311 North Aberdeen, Third Floor

Chicago, Illinois, 60607

Appeared on behalf of the Plaintiffs

LEIB KNOTT GAYNOR LLC, by

MR. DOUGLAS KNOTT and

MR. RANDAL N. ARNOLD

219 North Milwaukee Street, Suite 710

Milwaukee, Wisconsin, 53202

HINSHAW & CULBERTSON LLP, by

MR. MICHAEL RUSSART

100 East Wisconsin Avenue, Suite 2600

Milwaukee, Wisconsin, 53202

Appeared on behalf of Armor Correctional

ALSO PRESENT: Mr. Tim D'Agostino, Videographer

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1 T R A N S C R I P T O F P R O C E E D I N G S

2 (Exhibit No. 1-15 were marked for  
3 identification.)

4 THE VIDEOGRAPHER: Good afternoon. We are  
5 on the record. This is the videotaped deposition of  
6 Rebecca Terry in the matter of Rebecca Terry versus  
7 County of Milwaukee, et al. Case No. 17-CV-1112.

8 This deposition is taking place at  
9 219 North Milwaukee Street, Suite 710, Milwaukee  
10 Wisconsin, on June 1, 2018, at 12:11 p.m.

11 My name is Tim D'Agostino, I'm the  
12 videographer with U.S. Legal Support located at 740  
13 North Plankinton, Milwaukee, Wisconsin.

14 The video and audio recording will be  
15 taking place unless all counsel agree to go off the  
16 record.

17 Will counsel state their appearances for  
18 the record and who they represent, starting with the  
19 plaintiff, and then the court reporter will swear in  
20 the witness.

21 MS. KLEINHAUS: Theresa Kleinhaus appearing  
22 on behalf of Rebecca Terry.

23 MR. KNOTT: Doug Knott on behalf of the  
24 Milwaukee County defendants.

25 MR. RUSSART: Attorney Michael Russart

1 appears for Armor.

2 WHEREUPON,

3 REBECCA TERRY

4 Called for examination, being first duly  
5 sworn, was examined and testified as follows:

6 MR. KNOTT: I should have noted for the  
7 record, that also accompanying me is Cory Brewer, an  
8 associate of mine, and Randy Arnold, also an  
9 associate of mine.

10 E X A M I N A T I O N

11 BY MR. KNOTT:

12 Q Please state your full name for the record.

13 A Rebecca Lynn Terry.

14 Q And where do you currently live?

15 A In South Milwaukee.

16 Q Do you live with anybody there?

17 A Yes.

18 Q Who do you live with?

19 A My boyfriend's sister.

20 Q Okay. Does your boyfriend live there?

21 A Not currently, no.

22 Q What's your boyfriend's sister's name?

23 A Julaine Mercil.

24 Q Could you spell that for the record?

25 A J-u-l-a-i-n-e, M-e-r-c-i-l.

1 Q Ms. Terry, I presume that you met with your attorneys  
2 to talk about what's going to happen today; is that  
3 true?

4 A That is true.

5 Q So you're aware that I'm going to ask you questions  
6 and that you're under oath and you need to tell the  
7 truth; right?

8 A Yes, I understand that.

9 Q You understand that. And I presume you know that we  
10 can't speak over one another because it makes it more  
11 difficult for the court reporter to record what we're  
12 doing; okay?

13 A I understand.

14 Q I will try to let you finish your answer before I ask  
15 the next question; and if you could please wait for  
16 me to finish the question before you answer, that  
17 would be best.

18 Our responses need to be out loud.

19 Sometimes if you shake your head, I will ask you to  
20 confirm what you're saying, but I'm trying to get you  
21 to say a word on the record. I'm not trying to get  
22 you to change your answer.

23 Do you understand that?

24 A I do understand.

25 Q And finally, if you have any questions about what I'm

1 asking, if you don't understand my question, would  
2 you please speak up and ask me to clarify?

3 A I will do so.

4 Q If you go ahead and answer the question, I'm going to  
5 presume, and anyone who reads the transcript is going  
6 to presume, that you understood the question; fair?

7 A That is fair.

8 Q Are you taking any medications that would affect your  
9 ability to answer questions today?

10 A No, I'm not.

11 Q Do you currently take any prescribed medications  
12 whatsoever?

13 A I do.

14 Q What medications do you take?

15 A I take Suboxone, I take Lithium, I take  
16 Amitriptyline, and Prazosin.

17 Q What's the last one?

18 A Prazosin.

19 Q What's that?

20 A It's an adrenaline blocker for nightmares.

21 Q For your nerves?

22 A For nightmares.

23 Q And who prescribes those?

24 A Dr. Timothy Allen.

25 Q And where does Dr. Allen work?



1 A He recently moved. He works through Wheaton  
2 Franciscan in Union Grove.

3 Q Do you see him in Union Grove?

4 A I do.

5 Q And how long have you seen Dr. Timothy Allen?

6 A Approximately a couple of years.

7 Q Have you used any street drugs today?

8 A No.

9 Q Have you used any alcohol today?

10 A I have not.

11 Q When was the last time you used street drugs?

12 MS. KLEINHAUS: Object. I'm going to  
13 direct her not to answer that. I don't think any use  
14 of street drugs is relevant to this case.

15 MR. KNOTT: Well, relevance is not a proper  
16 objection. We're off to a bad start here, Tess, if  
17 you're going to object on the grounds of relevance.

18 MS. KLEINHAUS: Okay. I'm going to tell  
19 you that I believe the question is harassing, and we  
20 will move for a protective order under Rule 26(c).  
21 I'm directing her not to answer that.

22 MR. RUSSART: Can we have the witness  
23 excused from the room so we can have a discussion,  
24 please.

25 MS. KLEINHAUS: Sure.

1 MR. KNOTT: Let me -- before we do that,  
2 let's hold on a second. Are you claiming damages in  
3 this case? Are you claiming -- are you seeking  
4 compensation in this case?

5 MS. KLEINHAUS: Of course she is seeking  
6 money damages.

7 MR. KNOTT: You can't testify, Tess.

8 MS. KLEINHAUS: It calls for a legal  
9 conclusion.

10 MR. KNOTT: We're off to a very poor start.

11 BY MR. KNOTT:

12 Q Do you understand that you're seeking money  
13 compensation in this case?

14 A I do understand.

15 Q And that you're claiming that you suffer from anxiety  
16 as a result of what happened in March 2014?

17 A I do understand.

18 Q And that you claim that you suffer from depression as  
19 a result of that?

20 A Uh-huh, I do understand.

21 Q And that you suffer certain symptoms, such as  
22 nervousness, sleeplessness as a result?

23 A Correct.

24 Q Do you understand that the use of heroin, for  
25 instance, affects your health in a negative way?

1     A     I do understand that.

2                     MR. KNOTT:   Okay.   The witness should be  
3     excused while we discuss whether she is going to  
4     answer the question of when the last time was she  
5     used street drugs.

6                     MS. KLEINHAUS:   Just step right outside.

7                     THE VIDEOGRAPHER:   Going off the record?

8                     MS. KLEINHAUS:   No, we will stay on the  
9     record.

10                    MR. KNOTT:   So Tess, you shorted us on your  
11     interrogatory responses.   You gave us virtually no  
12     information.   I'm here to take her deposition.  
13     You're claiming damages that are amorphous, and we're  
14     entitled to know what other stressors she has in her  
15     life, and that's a very broad category, and we're  
16     going to talk about it all today.

17                    MR. RUSSART:   You also indicated in an  
18     email that you're only producing her once, so  
19     instructing a witness not to answer on the grounds of  
20     the question is irrelevant does not -- is not a  
21     proper grounds for an instruction of that nature.

22                    So we can, I guess, call the court,  
23     whatever you think you need to do in order to stand  
24     by your contention that you're only producing her  
25     once.

1 MS. KLEINHAUS: So I'm directing her not to  
2 answer under Rule 26(c). We will move to get a  
3 protective order from the court. If the court rules  
4 that you're allowed to ask about street drug use  
5 since this incident, then obviously she will have to  
6 be produced to answer those questions and we will  
7 abide by the ruling of the court.

8 MR. RUSSART: Why didn't you move for a  
9 protective order before today?

10 MS. KLEINHAUS: There is no requirement  
11 that I move in advance. I didn't know what he's  
12 going to ask, but I'm -- that's the procedure under  
13 Rule 26, so that's what I'm going to follow.

14 MR. KNOTT: So your position is that the  
15 question is not -- seeks information that's not  
16 relevant or would lead to the discovery of relevant  
17 information?

18 MS. KLEINHAUS: No, my position is that  
19 it's harassing, and one of the reasons that it's  
20 harassing is that it's not relevant to the claims in  
21 this case.

22 MR. RUSSART: That's your position, but  
23 obviously Doug laid the groundwork here for the fact  
24 that it is relevant to the claims of damages that she  
25 is making. I mean, if she is continuing to use

1 street drugs and whatever methods and modes she  
2 applies to get the funds to get those drugs, it  
3 affects her potentially emotionally, it can affect  
4 symptoms of PTSD, it could exacerbate PTSD, it could  
5 cause PTSD depending on what she is doing.

6 So since that's the claim that's being  
7 made, I would strongly disagree that it's irrelevant.

8 MR. KNOTT: Every aspect of her life since  
9 the date that she was allegedly injured is relevant,  
10 and it doesn't need to be relevant for the purpose of  
11 the deposition, so -- it was about the fourth or  
12 fifth question, and you're going to instruct her  
13 not to -- it was the first time I asked about the use  
14 of illegal drugs, and you're going to instruct her  
15 not to answer on the basis that that question is  
16 harassing?

17 MS. KLEINHAUS: I instructed her not to  
18 answer, and we're going to seek a protective order on  
19 that basis. If you want to talk to her about the  
20 symptoms and experiences that she has had as a result  
21 of what happened at Milwaukee County Jail, obviously  
22 you're entitled to do that as part of your damages  
23 case, and clearly we disagree what's relevant to her  
24 damages, and we will have to have a court, I guess,  
25 decide that if we haven't come to an agreement.

1 MR. KNOTT: We're not going to come to an  
2 agreement. Are you terminating the deposition?

3 MS. KLEINHAUS: No, I'm instructing her not  
4 to answer that question.

5 MR. KNOTT: I think your obligation is to  
6 terminate the deposition and seek a protective order.

7 MS. KLEINHAUS: No, I disagree that that's  
8 my obligation. She is prepared to answer your  
9 questions today. She is eager to get it done, so  
10 let's get it done. And to the extent that there are  
11 questions that I direct her not to answer, we will  
12 seek a protective order and we can litigate it and  
13 you can take your position.

14 MR. KNOTT: So I can't ask the questions in  
15 the order that I would like to ask them. You get to  
16 instruct her not to answer questions because you  
17 don't think it's relevant. I don't think it's the  
18 right way to proceed.

19 MS. KLEINHAUS: You can ask them in any  
20 order that you choose. There may -- as in any  
21 deposition, there may be questions that I direct her  
22 not to answer.

23 MR. RUSSART: Well, there is medical  
24 records that exist after her -- after giving birth at  
25 the jail in which it indicates that she was using

1 illicit drugs. Are you going to say that we can't  
2 ask about those medical records or about those  
3 reports of her use of illegal drugs? Because you  
4 said earlier, anything after the birth we can't ask  
5 her that.

6 MS. KLEINHAUS: We probably need to take it  
7 question by question.

8 MR. RUSSART: I think I agree with Doug.  
9 Maybe it's not your obligation. If Doug wants to  
10 proceed in a certain fashion, it's his obligation to  
11 terminate the deposition and seek costs.

12 MR. KNOTT: Yeah, I think we need to see if  
13 the court is available, because this is going to --  
14 the deposition will not serve a purpose if we are not  
15 able to ask about her damages.

16 MS. KLEINHAUS: Okay.

17 THE VIDEOGRAPHER: Going off the record at  
18 12:22 p.m.

19 (Off the record.)

20 THE VIDEOGRAPHER: We're back on the record  
21 at 12:38 p.m.

22 MR. KNOTT: Well, I attempted to reach the  
23 court to resolve the issue of the instruction not to  
24 answer one of the first questions in the deposition,  
25 and the judge is no longer available for the day, is

1 in meetings this afternoon, and so we are not able to  
2 resolve it in that fashion.

3 I'm under a great deal of time pressure  
4 with a summary judgment deadline of June 11. This  
5 hampers me a great deal.

6 I'm asking for your stipulation to a motion  
7 to extend the deadline for summary judgment in  
8 exchange for we continue this deposition without the  
9 court's involvement at this time, which I think is  
10 improper. I think you're waiving your right to bring  
11 a protective order on these questions by not halting  
12 the deposition and seeking a protective order now.

13 MS. KLEINHAUS: My understanding is that  
14 the proper procedure is to take it question by  
15 question to determine whether or not she can answer  
16 and direct her based on that question.

17 As I said before this break, we're under no  
18 obligation to terminate the deposition because we  
19 have directed her not to answer on one question.  
20 We're not going to terminate it on that basis and  
21 we're not under an obligation to do so.

22 We are obligated to advise her question by  
23 question, that's what I will do, and tell her not to  
24 answer the things that I think she is not required to  
25 answer, and we will seek a protective order as to



1 those questions. I'm not willing to agree to an  
2 extension of the dispositive motion schedule. In  
3 depositions, it's common for there to be -- perhaps  
4 not common, but it happens that there are questions  
5 that witness are told not to answer, and the parties  
6 have to sort that out, so we're not terminating the  
7 deposition. We object to it being terminated. We  
8 want to continue and have her answer everything that  
9 she can answer.

10 MR. KNOTT: Can you tell me what questions  
11 she will answer about her health, counseling, and  
12 stressors, other than the injury allegedly related to  
13 this -- to this incident?

14 THE WITNESS: I can tell you broadly. I'm  
15 not -- I'm going to direct her not to answer  
16 questions about use of street drugs since this  
17 incident, because it's not relevant to her damages.

18 MR. KNOTT: I'm sorry, just -- you're going  
19 to direct her to not answer questions related to  
20 street drugs what in this incident?

21 MS. KLEINHAUS: Since this incident, so  
22 postdating this incident. If you want to talk to her  
23 about other stressors in her life, whatever that  
24 might entail, at this time I don't see a reason why I  
25 would direct her not to answer those. So obviously,

1 you know, you can ask them. As I said, I tend to  
2 take it question by question as we always do in  
3 deposition.

4 MR. RUSSART: So my concern here is if she  
5 would answer the question about when she last used  
6 street drugs, you know, we would then proceed to ask  
7 her questions about how she obtained those drugs,  
8 what the cost was, how frequently she was using it,  
9 whether cost was over the course of a week or over  
10 the course of a month, where did she get that money  
11 to do that, did she encounter any trauma or  
12 situations that caused her injury during the period  
13 of time that she was doing whatever she needed to do  
14 to get the money for the drugs. All of those things  
15 that would go to an assessment of whatever anxiety or  
16 PTSD she has as related to the incident and the jail  
17 versus what's been ongoing in her life, you're saying  
18 she is not going to answer any of those types of  
19 questions?

20 MS. KLEINHAUS: Correct.

21 MR. RUSSART: Okay. Because you believe  
22 those are harassing, that's -- as opposed to seeking  
23 relevant information relative to the extent of her  
24 life causing her condition versus this incident  
25 causing the condition.

1 MS. KLEINHAUS: I think you understand my  
2 position.

3 MR. RUSSART: Okay.

4 MR. KNOTT: And just for the record, we  
5 asked for records of treatment for her counseling,  
6 and you refused to provide authorizations for that  
7 whether before or after.

8 MS. KLEINHAUS: I disagree with that, Doug.  
9 We provided medical authorizations. We came to an  
10 agreement with you about the time frame, and we  
11 provided that, and we provided answers to  
12 interrogatories. So if you wanted those records, you  
13 were in a position to seek them.

14 MR. KNOTT: Please don't interrupt me.

15 And we are about three questions into this  
16 deposition when the witness revealed the use of  
17 medications and -- that we -- and a provider that we  
18 have never been informed of. You feel no obligation  
19 to tell us about her treatment?

20 MS. KLEINHAUS: No, that's wrong. That  
21 information has been provided to you in written  
22 discovery, but now I think we're getting away from  
23 the central issue that we're trying to resolve right  
24 now, which is can you proceed with the deposition and  
25 go question by question. That's what we would like

1 to do.

2 MR. KNOTT: Well --

3 MR. RUSSART: I have another question  
4 before we go ahead, and I wanted to make sure that  
5 the record is clear. You made no attempt before this  
6 deposition to inform us that there would be no  
7 testimony allowed relative to her post-incident  
8 illicit drug use. That's correct; right?

9 MS. KLEINHAUS: I'm not the deponent here  
10 who has to answer questions.

11 MR. RUSSART: I'm trying to make a record.

12 MR. KNOTT: You have interrupted the  
13 examination.

14 MR. RUSSART: Don't you want to make a  
15 record, Tess?

16 MS. KLEINHAUS: I'm under no obligation to  
17 tell you in advance of the deposition what my  
18 objections will be at the deposition. And given that  
19 I'm not under that obligation, no, I did not write  
20 you to tell you about my deposition preparation.

21 MR. RUSSART: Perfect.

22 MR. KNOTT: Well, I do think it's your  
23 obligation to seek a protective order, otherwise the  
24 witness is obligated to answer subject to the court's  
25 determination, on the basis of the transcript, as to

1 admissibility of that testimony.

2 I have an approaching deadline for summary  
3 judgment, and you have -- you will not stipulate to  
4 any -- to even agreeing that we can have this issue  
5 resolved before that deadline.

6 You put me in a position of -- of  
7 potentially waiving my ability to prepare and submit  
8 summary judgment as it should be submitted. I have  
9 no choice in my mind without knowing how the court  
10 would rule, but to go forward of course, if you  
11 are -- if we are required to come back and complete  
12 this deposition, we will seek full costs, I think.

13 MR. RUSSART: I just -- I think it's  
14 reasonable for us to take the position here that the  
15 deposition will have to be completed after this issue  
16 is determined so that we can fully cross-examine your  
17 witness on damages, so I don't intend to go into any  
18 questions on damages today on the basis that I don't  
19 want my deposition interrupted by your instructions  
20 not to answer.

21 MS. KLEINHAUS: That's your choice, but  
22 I -- I'm only directing her not to answer related to  
23 one -- you know, a question related to one subject  
24 area. You want to waive asking about damages in  
25 totality, that's your --

1 MR. RUSSART: Well --

2 MS. KLEINHAUS: Let me finish.

3 MR. RUSSART: I'm going to.

4 MS. KLEINHAUS: That's your option, but the  
5 matter that's to be litigated with the court is this  
6 issue of questions about street drugs after this  
7 incident. So, you know, the court's order will be  
8 related to answering those questions, not damages  
9 generally.

10 MR. RUSSART: I think you're wrong,  
11 because --

12 MS. KLEINHAUS: Okay. Doug, if you want to  
13 not ask her about damages, that's fine.

14 MR. RUSSART: I am going to make a record,  
15 and you asked me not to interrupt you, I would prefer  
16 the same courtesy. Can you do that?

17 MS. KLEINHAUS: Proceed.

18 MR. RUSSART: The situation is, though, for  
19 example, if we ask questions about whether she has  
20 custody of Leland now and when she got it and when  
21 she was prevented from getting it, it's most likely  
22 going to lead to questions and answers about her  
23 addiction and whether she was sober at the time and  
24 whether she wasn't.

25 And so I don't see how we can unwind all of

1 that when you're not going to let her answer any  
2 questions about her illicit drug use, so I think this  
3 poses quite a conundrum.

4 MS. KLEINHAUS: Okay. So shall I bring the  
5 witness back in?

6 MR. KNOTT: Let's take a minute to  
7 determine how we're going to go forward.

8 MR. RUSSART: One last question. Just so  
9 it's clear, you are not agreeing to allow the  
10 deposition to go forward on just the deliberate  
11 indifference claims and not damages and then  
12 reconvene on damages. You're saying that you will  
13 not agree to that, or would you agree to that?

14 MS. KLEINHAUS: No, I would not agree to  
15 that.

16 MR. RUSSART: Okay.

17 MS. KLEINHAUS: I haven't directed her not  
18 to answer on damages. I haven't directed her not to  
19 answer about her kids. I have directed her not to  
20 answer about street drugs, and that's our position, I  
21 think it's clear, and why don't you all take your  
22 break and decide what you want to do.

23 THE VIDEOGRAPHER: Going off the record at  
24 12:49 p.m.

25 (Off the record.)

1 THE VIDEOGRAPHER: Back on the record at  
2 12:58 p.m.

3 MR. KNOTT: Given the deadlines that we  
4 discussed, I see no choice but to proceed. I'm not  
5 waiving my right to have full and complete answers  
6 and to complete the deposition when this issue is  
7 resolved.

8 BY MR. KNOTT:

9 Q Ms. Terry, you're going to follow the advice of your  
10 counsel and not answer the pending question?

11 A Okay.

12 Q Is that true?

13 A Oh, I'm sorry, I didn't realize you were asking, I  
14 thought you were telling me. I am going to follow my  
15 counsel's advice.

16 Q You have in the past used street drugs?

17 A That is correct.

18 Q And you have in the past, since the time of the  
19 incident involved in this litigation, used street  
20 drugs?

21 MS. KLEINHAUS: I'm going to object and  
22 direct her not to answer that question.

23 BY MR. KNOTT:

24 Q And you, in fact, were a heroin addict for a period  
25 of time; correct?



1 A Correct.

2 Q Do you consider yourself an addict today?

3 A I consider myself a recovering addict today.

4 Q Are you currently receiving any counseling?

5 A I'm sorry?

6 Q Are you currently receiving any counseling?

7 A No. Not formal counseling, no.

8 Q And any informal counseling?

9 A Yes, as far as NA meetings and things like that, and  
10 then through my doctor.

11 Q What meetings?

12 A Like NA meetings.

13 Q What's that?

14 A Narcotics Anonymous.

15 Q And your doctor is Dr. Allen?

16 A Yes, sir.

17 Q And do you have a mental health diagnosis?

18 A I do.

19 Q What is that?

20 A Bipolar disorder and PTSD.

21 Q And who diagnosed you with PTSD?

22 A Dr. Timothy Allen.

23 Q And when was that?

24 A I'm not sure.

25 Q Do you claim that that mental health diagnosis is the

1 result of some conduct of the defendants in this  
2 case?

3 MS. KLEINHAUS: Object to the extent it  
4 calls for a legal conclusion. You can answer.

5 THE WITNESS: The way that I would answer  
6 that is I didn't have these issues before the  
7 incident that we're talking about, so I do believe  
8 that that played a part in it.

9 BY MR. KNOTT:

10 Q Did you have a diagnosis of posttraumatic stress  
11 disorder before March of 2014?

12 A No.

13 Q Do you claim that that condition is a result of the  
14 events in this litigation?

15 A I do.

16 Q And has that impaired your ability to function?

17 A It has.

18 Q Are you claiming in this litigation that you suffered  
19 anxiety as a result of the events, March 2014?

20 A Correct.

21 Q And have you since March of 2014 sought treatment for  
22 anxiety?

23 A I have.

24 Q Are the medications you're taking today for treatment  
25 of anxiety?

1 A Not directly, no.

2 Q What are they for treatment of?

3 A Suboxone is treatment for opiate dependency.

4 Amitriptyline is like a sleep medicine. It helps  
5 with the sleeplessness. The Prazosin is for the  
6 nightmares and night terrors, and then the Lithium is  
7 for bipolar.

8 Q You were a heroin addict, per my review of the  
9 records, for at least six years?

10 A Correct.

11 Q How long were you a heroin addict?

12 MS. KLEINHAUS: Object to the form of the  
13 question. You can answer.

14 THE WITNESS: I'm not sure I understand.  
15 That seemed like the same question.

16 BY MR. KNOTT:

17 Q How long were you using heroin?

18 MS. KLEINHAUS: Object to the form of the  
19 question. I'm going to direct her not to answer.

20 BY MR. KNOTT:

21 Q When did you start using heroin?

22 A I believe I was around 26 years old.

23 Q How old are you today?

24 A 36.

25 Q Do you agree with me that the use of heroin can alter

1 your perception of reality?

2 A I do.

3 Q Do you agree with me that it can alter your memory?

4 A I do.

5 Q Have you ever suffered blackouts as a result of use  
6 of street drugs?

7 A Only once that I can remember.

8 Q And when was that?

9 A That was through an overdose. That was a relapse  
10 that I had not too far in the past. I'm not sure the  
11 exact date.

12 Q When did you suffer a relapse and what drugs did you  
13 use?

14 MS. KLEINHAUS: Object to the extent it  
15 requests information about illicit street drugs since  
16 the time of this incident. I will direct her not to  
17 answer.

18 MR. KNOTT: So I think she has answered the  
19 question that she had a relapse since the time of  
20 these events. We're entitled to explore that.

21 MS. KLEINHAUS: I'm directing her not to  
22 answer it.

23 BY MR. KNOTT:

24 Q Ms. Terry, have you used heroin today?

25 A I have not.

1 MS. KLEINHAUS: I'm directing -- no, go  
2 ahead, finish your answer.

3 THE WITNESS: Because I thought I answered  
4 that question already twice.

5 BY MR. KNOTT:

6 Q Have you used marijuana today?

7 A No, I haven't.

8 Q Have you used marijuana since March of 2014?

9 MS. KLEINHAUS: I'm going to direct her not  
10 to answer that.

11 BY MR. KNOTT:

12 Q Were you arrested when you suffered a relapse most  
13 recently?

14 A No, I was not.

15 Q Did you seek treatment and get treatment as a result  
16 of that relapse?

17 MS. KLEINHAUS: I will just object and  
18 direct her not to answer.

19 BY MR. KNOTT:

20 Q Did you relapse as a result of stress in your life?

21 MS. KLEINHAUS: Just object and direct her  
22 not to answer.

23 BY MR. KNOTT:

24 Q Is it troubling to you as a person when you're using  
25 heroin and unable to stop?

1 MS. KLEINHAUS: Just object to the form of  
2 the question. There is no time frame, it's phrased  
3 in the present tense, so I'm going to direct her not  
4 to answer.

5 BY MR. KNOTT:

6 Q Ms. Terry, you have an experience in your lifetime  
7 with the use of heroin. Is it fair to say that those  
8 times have been low points in your life?

9 A Yes.

10 Q And it has caused you to live your life in a way that  
11 is not your preference; fair?

12 A Fair.

13 Q And --

14 MS. KLEINHAUS: That's fine, that's okay.

15 BY MR. KNOTT:

16 Q At some point since March of 2014, you have told us  
17 you relapsed and were using heroin --

18 MS. KLEINHAUS: I'm going to direct her --

19 MR. KNOTT: -- correct?

20 MS. KLEINHAUS: Sorry. Are you through?

21 MR. KNOTT: Yeah.

22 MS. KLEINHAUS: I'm going to direct her not  
23 to answer.

24 BY MR. KNOTT:

25 Q If you had relapsed since March 2014, would that have

1           been another low point in your life?

2                   MS. KLEINHAUS: I'm going to direct her not  
3           to answer.

4 BY MR. KNOTT:

5 Q       Any time you relapse, do you agree with me that it  
6       is -- causes stress?

7                   MS. KLEINHAUS: I'm going to direct her not  
8       to answer to the extent there is no time frame in the  
9       question.

10                  MR. KNOTT: I'm -- this is ridiculous. I  
11       can't ask her about her emotional state in general  
12       because you're going to direct her not to answer.

13                  MS. KLEINHAUS: I need to make clear our  
14       position is her emotional state as a result of what  
15       happened in the jail we believe is relevant. If you  
16       want to talk to her about drug use during that  
17       pregnancy, you know, I'm not going to direct her not  
18       to answer that. So as I said, we will take it  
19       question by question.

20 BY MR. KNOTT:

21 Q       Ms. Terry, you're claiming in this lawsuit that you  
22       have suffered nightmares as a result of the conduct  
23       of the defendants?

24 A       Correct.

25 Q       Did -- in general, does your use of heroin in the

1 past impact your ability to sleep?

2 A I -- I'm not sure.

3 MS. KLEINHAUS: Object to the form of the  
4 question. You can answer it, if you understand it.

5 THE WITNESS: I guess the way I would  
6 answer that would be not the use of heroin, but not  
7 using heroin once I have been using heroin at that  
8 time. So if I was going through withdrawals, it  
9 would cause sleeplessness at that time when I was a  
10 daily user.

11 BY MR. KNOTT:

12 Q And have you gone through withdrawals since March of  
13 2014?

14 MS. KLEINHAUS: Go ahead and answer that.

15 THE WITNESS: Yes.

16 BY MR. KNOTT:

17 Q And when did that occur?

18 MS. KLEINHAUS: I'm going to direct you not  
19 to answer that.

20 BY MR. KNOTT:

21 Q How long did the withdrawals persist?

22 MS. KLEINHAUS: I'm going to direct her not  
23 to answer that.

24 BY MR. KNOTT:

25 Q Did it impact your ability to sleep?



1 MS. KLEINHAUS: I'm going to go ahead and  
2 direct her not to answer that either.

3 BY MR. KNOTT:

4 Q Are you claiming that your post March 2014 relapse  
5 was a result of stress that you suffered in  
6 March 2014?

7 MS. KLEINHAUS: You can answer that.

8 THE WITNESS: Let me clarify what you're  
9 asking. You're saying that the relapse I was  
10 speaking about before, was that a direct result of  
11 what happened --

12 BY MR. KNOTT:

13 Q Are you claiming that it was a result at all of the  
14 conduct of these defendants?

15 A In part, yes.

16 Q In what part?

17 A In part any kind of relapse that I have had would --  
18 after I quit using drugs was mainly to numb feelings  
19 that I had brought on by not using drugs and feelings  
20 that I had surrounding that event are -- are the  
21 strongest feelings that I would have had to numb out  
22 or that I tried to numb out.

23 Q I'm sorry, what was --

24 A Or symptoms or whatever?

25 Q I'm sorry, what was the end of that, that you tried

1 to --

2 A To numb out, to not -- so not having the dreams, not  
3 having the nightmares, not having the flashbacks or  
4 the debilitating anxiety attacks, those type of  
5 things.

6 Q So your testimony is that since March 2014, you used  
7 heroin in order to numb the effects of the emotional  
8 injuries you suffered in -- as a result of these  
9 defendants?

10 A Correct, until I actually got on medication to deal  
11 with it.

12 Q And who prescribed that medication?

13 A Dr. Timothy Allen.

14 Q And how much heroin were you using per day as a  
15 result of the conduct of these defendants?

16 MS. KLEINHAUS: Object to the form of the  
17 question, and I will direct her not to answer.

18 If I can clarify, as a legal matter, she is  
19 not seeking damages for the relapse in this lawsuit.  
20 Obviously subjectively her experience that she  
21 experiences them is related. You have that  
22 testimony. We're not seeking damages from your  
23 clients because she experienced a relapse.

24 MR. RUSSART: Can you just use legal  
25 objections, please, Ms. Kleinhaus?

1 MR. KNOTT: And, you know, pardon me, but I  
2 think it's going to be a little hard for the jury to  
3 sort out the cause of the damages you're claiming if  
4 we can't explore it and if we are not allowed to  
5 trace the source of her alleged distress.

6 BY MR. KNOTT:

7 Q Ms. Terry, did your use of illegal street drugs post  
8 March 2014 cause you to experience distress?

9 A I'm sorry, can you repeat that?

10 Q Did it cause you to feel -- to experience distress?

11 MS. KLEINHAUS: Object to the form of the  
12 question. You can answer.

13 THE WITNESS: Did my use of street drugs --  
14 I'm sorry, can you repeat the last part one more  
15 time? I'm not sure I understood at first.

16 BY MR. KNOTT:

17 Q In your lifetime, when you are addicted to heroin,  
18 does it cause you emotional distress?

19 A Yes.

20 Q Does it impact your relationship with others?

21 A Yes.

22 Q Does it impact your ability to be a mother?

23 A Yes.

24 Q Did your use of illegal street drugs after March of  
25 2014 interfere with your relationship with others?

1 MS. KLEINHAUS: Object to the form of the  
2 question, asked and answered. You can answer again.

3 THE WITNESS: Yes.

4 BY MR. KNOTT:

5 Q Tell me what you're claiming occurred in terms of  
6 your relationship with others.

7 MS. KLEINHAUS: Just object to the form of  
8 the question. She hasn't claimed anything occurred  
9 with her relationship with others.

10 MR. KNOTT: I think she just did.

11 MS. KLEINHAUS: Go ahead and answer if you  
12 understand.

13 THE WITNESS: May I ask if this is what  
14 you're asking me? You're saying as a result of my  
15 drug use since the incident in March of 2014, what  
16 was the impact of -- with my relationship with  
17 others? Is that how I'm understanding it?

18 BY MR. KNOTT:

19 Q That's right.

20 A I -- I would isolate from people. I didn't want to  
21 be around people. That was the biggest part of it,  
22 or people being concerned about me and struggling to  
23 maintain relationships.

24 Q Did you go to a treatment center after your release  
25 from jail in March of 2014?

1 MS. KLEINHAUS: Object to the form. Asked  
2 and answered.

3 THE WITNESS: Are you asking in March did I  
4 go or --

5 BY MR. KNOTT:

6 Q Yeah.

7 A -- after that incident?

8 Q After.

9 A Yes.

10 Q Where did you go?

11 A I sought treatment at a few different places: UCC,  
12 META House.

13 Q What is UCC?

14 A United Community Center.

15 Q Where is that located?

16 A I'm not exactly sure. It's on the south side of  
17 Milwaukee.

18 Q When did you go to UCC?

19 MS. KLEINHAUS: I'm going to direct her not  
20 to answer that.

21 BY MR. KNOTT:

22 Q When did you go to seek treatment for -- at Beta  
23 house?

24 A META House.

25 MS. KLEINHAUS: I'm going to instruct her

1 not to answer.

2 BY MR. KNOTT:

3 Q I'm sorry, what's the name of the house?

4 A META House, M-E-T-A.

5 Q And where is that located?

6 A Again, I'm not sure. It's like the east side of  
7 Milwaukee. And then may I finish answering the  
8 question about where else I sought treatment?

9 Q Of course.

10 A Like the -- my doctor that I spoke about before, Dr.  
11 Allen, I went to him specifically seeking help with  
12 addiction through medication, and then he helped me  
13 with the other stuff as well.

14 Q And you went to META House after your discharge from  
15 the Milwaukee County Jail in March 2014; true?

16 MS. KLEINHAUS: Objection; asked and  
17 answered. You can answer again.

18 THE WITNESS: I did go after I was  
19 discharged from jail at some point, yes.

20 BY MR. KNOTT:

21 Q And when?

22 A I'm not sure when exactly it was. Some time since  
23 then. That was a few years ago. I went there  
24 seeking help.

25 Q And do you know how much your treatment at META House

1 cost?

2 A I would not have known that.

3 Q Did you pay out of pocket for treatment at UCC?

4 A I did not.

5 Q Who paid for that treatment?

6 A I don't know if UCC was county-funded or through my  
7 state insurance.

8 Q Who paid for META House?

9 A Again, the same answer applies.

10 Q And who pays for your treatment with Dr. Allen?

11 A I have state insurance that pays for it.

12 Q State insurance?

13 A Yes.

14 Q Do you contribute to your state insurance?

15 A I do not.

16 Q Have you used cocaine today?

17 A I have not.

18 Q Have you used cocaine since March 2014?

19 MS. KLEINHAUS: I'm going to direct her not  
20 to answer that.

21 BY MR. KNOTT:

22 Q Have you used crack cocaine in the past?

23 MS. KLEINHAUS: Object to the form of the  
24 question. I'm going to direct her not to answer  
25 that.

1 BY MR. KNOTT:

2 Q Do you agree with me that the use of crack cocaine,  
3 in your experience, has an impact on your ability to  
4 remember?

5 MS. KLEINHAUS: I'm going to object to the  
6 form of the question. Assumes facts that haven't  
7 been established. I'm going to direct her not to  
8 answer.

9 MR. KNOTT: I'm sorry, what? Object to the  
10 form of the question, what?

11 MS. KLEINHAUS: I objected to the form of  
12 the question and I directed her not to answer.

13 MR. RUSSART: "Assumes facts not in  
14 evidence" she said.

15 MR. KNOTT: Oh, thank you.

16 MR. RUSSART: I think she is referring to  
17 the fact that you used the modifier "crack."

18 BY MR. KNOTT:

19 Q Ms. Terry, have you in the past used crack cocaine?

20 MS. KLEINHAUS: I'm going to object and  
21 direct her not to answer.

22 BY MR. KNOTT:

23 Q In your experience, does crack cocaine have an impact  
24 on your ability to perceive events around you?

25 MS. KLEINHAUS: I'm going to direct her not



1 to answer.

2 BY MR. KNOTT:

3 Q Were you using crack cocaine on March 9, 2014?

4 A I believe I was.

5 Q And when had you last used crack before you were  
6 arrested?

7 A When you say when I was arrested, did you mean on  
8 March 19th, 2014?

9 Q March 9.

10 A Thank you. Sometime within that day. I'm not  
11 sure -- it was probably earlier in the day, but I  
12 don't know an exact time.

13 Q And how -- when had you last used heroin before you  
14 were arrested?

15 A Again, it was earlier that day.

16 Q Can you tell me any more specifically?

17 A I don't know an exact time. It was daylight.

18 Q Other than bipolar disorder and PTSD, do you have any  
19 other medical or mental health diagnoses?

20 A No, Dr. Allen and I are working through one by one.

21 Q Have you ever -- is Dr. Allen a psychiatrist?

22 A He's an addiction specialist, a psychiatrist, and  
23 family medicine.

24 Q Before Dr. Allen, had you ever made an appointment  
25 and seen a psychiatrist, psychologist, or addiction

1 specialist?

2 A In my life?

3 Q Yes.

4 A Yes.

5 Q Where?

6 A Honestly I couldn't tell you. Since I was 12 years  
7 old, they have had me going to psychiatrists and  
8 therapists.

9 Q And is it your practice when speaking to your  
10 psychiatrist and therapists to always tell them the  
11 truth?

12 A Yes.

13 Q That's important so that you can receive appropriate  
14 treatment?

15 A I believe so.

16 Q And so when you sought treatment following a relapse  
17 after March of 2014, you would have told them about  
18 all of the stressors in your life?

19 A Correct.

20 Q And you did that?

21 A I did.

22 Q You initially saw someone for psychiatric therapy in  
23 2010 -- I'm sorry, since you were 10 years old?

24 MS. KLEINHAUS: Object to the form of the  
25 question. You can answer.

1 BY MR. KNOTT:

2 Q Did you just tell me that you have been seeing  
3 therapists since you were 10 years old?

4 A I said 12.

5 Q And what resulted in your seeing a therapist at 12  
6 years old?

7 A What resulted in or --

8 Q Why did you see a therapist at 12 years old?

9 A My mother passed away when I was 12, and shortly  
10 after that I went into foster homes. I was having  
11 trouble dealing with it, so I don't know if it was  
12 social workers or a foster parent that felt that  
13 maybe it would be beneficial.

14 Q Did you live with your mother?

15 A I lived with my mother and father.

16 Q And when your mother passed away, you went in foster  
17 homes?

18 A A few months after my mother passed away.

19 Q And how many foster homes did you live in?

20 A I don't know the exact number.

21 Q Have you ever been subject to physical violence in  
22 the past?

23 A In general?

24 Q Ever.

25 A Yes.

1 Q At -- when?

2 A When I was younger.

3 Q What's that mean, when you were younger? You will  
4 need to be more specific.

5 A Before 18. Between 12 and 18.

6 Q And can you tell me what happened?

7 A To physical violence in general, I -- there were  
8 times that I would be in fights at school, like other  
9 kids picking on me or whatever. I witnessed violence  
10 through group homes that I was in. Same kind of  
11 thing, kids picking on each other. Then also at a  
12 foster home, the male figure in the household was  
13 physically violent to some of the foster children.

14 Q And you witnessed that physical violence?

15 A I did.

16 Q Were you subject to that physical violence?

17 A Once.

18 Q And when was that?

19 A Again, I'm not sure how old I was. It was between  
20 maybe 14 and 15.

21 Q Did you seek any therapy as a result of being subject  
22 to abuse by a foster parent?

23 A Yes, that was part of -- yes.

24 Q Where did you receive that therapy?

25 A I'm not sure in what -- because the different

1 therapists, from the time I was 12 to 18, I don't  
2 really have a great chronological memory of when I  
3 saw who.

4 Q Did that event, and your life in foster homes, cause  
5 you to feel anxiety?

6 A At that time.

7 Q And did you begin to use street drugs in order to, as  
8 you said, self-medicate for anxiety?

9 MS. KLEINHAUS: Just object to form as to  
10 the time, but you can answer.

11 THE WITNESS: No. Not -- no.

12 BY MR. KNOTT:

13 Q Is there a reason that you can give us for your use  
14 initially of street drugs?

15 A Initially it was because my boyfriend was doing it,  
16 and it just -- he talked me into, "oh, this is so  
17 great," so I guess that would be considered peer  
18 pressure.

19 Q You had attempted suicide in the past?

20 A Yes.

21 Q On how many occasions?

22 A I don't know, maybe three or four when I was younger.  
23 Again, when I say "younger," I mean between 12 and  
24 maybe 15.

25 Q And how did you attempt suicide?

1 A The times that I remember, with pills that were left  
2 over from my mom being sick.

3 Q Did you suffer from depression prior to March 2014?

4 A Yes, again, when I was younger.

5 Q Were you -- did you obtain any treatment for  
6 depression after 2010?

7 A After -- I'm sorry, after 2010?

8 Q Right.

9 A Until the present? Yes.

10 Q And when did you initially receive treatment for  
11 depression?

12 A I -- I couldn't tell you. I don't remember exactly.

13 Q Was it with Dr. Allen?

14 A No, it was when I was younger. Between the ages of  
15 12 and 15, like I said.

16 Q Had any medications been prescribed for you to use  
17 when you were arrested on March 9, 2014?

18 MS. KLEINHAUS: Just object to the form.  
19 You can answer, if you understand.

20 THE WITNESS: I don't quite understand.  
21 Can you clarify?

22 BY MR. KNOTT:

23 Q Had anyone prescribed medication for you to use for  
24 any reason when you were arrested on March 9, 2014?

25 A Not that I -- I mean, on March 9th, 2014, I didn't

1 see a doctor.

2 Q No, the question is had anybody prescribed, prior to  
3 that date, any medications for you that were current  
4 medications when you were arrested?

5 A No. Thank you for putting the "current" in.

6 Q Have you been pregnant since 2014?

7 A No.

8 Q Have you received any gynecological care since 2014?

9 A I have.

10 Q Who is your OB/GYN?

11 A I don't have a specific OB/GYN. I go to Planned  
12 Parenthood.

13 Q And you see the physicians there?

14 A Correct.

15 Q And did you discuss with the physicians there the  
16 circumstance of the birth in the jail?

17 A I believe at one time or another I did, yes.

18 Q What do you recall discussing with the Planned  
19 Parenthood physicians?

20 A I just explained how everything unfolded the night  
21 that I gave birth to Leland and -- yeah, that was it,  
22 just how everything unfolded.

23 Q Any other physicians other than Dr. Allen and a  
24 physician at Planned Parenthood that you discussed  
25 the circumstance in March 2014 with?

1 A Um, no. No.

2 Q Prior to March 2014, you had been in a correctional  
3 facility?

4 A Correct.

5 Q Had you been in facilities other than the Milwaukee  
6 County Jail?

7 A Just one other time, yes.

8 Q And where was that?

9 A The House of Correction in Franklin.

10 Q Okay. And did you know how to file a grievance in  
11 March 2014?

12 A I had never done that before; so, no, I didn't.

13 Q Did you know how to file or how to -- how to author a  
14 slip and get the attention of the guards or medical  
15 care?

16 MS. KLEINHAUS: Just object to the form of  
17 the question. You can answer.

18 BY MR. KNOTT:

19 Q Do you know what a flag is?

20 A No, I don't know what a flag is.

21 Q A pink slip?

22 A Oh, yes.

23 Q And what is that?

24 A I believe it's for medical attention; for, you know,  
25 a doctor's appointment or something to that effect.



1 Q And had you ever in your lifetime written one of  
2 those?

3 A I don't know. I don't recall. I don't believe -- I  
4 don't know.

5 Q You never -- have you ever written in any context a  
6 summary of what occurred to you in March 2014?

7 A In what context, "a summary."

8 Q Have you ever put down on paper what happened to you?

9 A I have written specific parts of it in my journal.  
10 Is that what you're asking?

11 Q Yes.

12 A Yes.

13 Q Do you have a journal?

14 A I do.

15 Q Did you bring it with you?

16 A I did not. I have several different ones.

17 Q How many do you have?

18 A I don't know. I will write down in a notebook and  
19 then write down in a different notebook. It was a  
20 technique I learned when I was younger, to write down  
21 things to help deal with them.

22 Q Oops, I think we're one short. I'm giving you a copy  
23 of the notice of deposition for today. Have you seen  
24 that before?

25 A I don't remember seeing this.

1 MS. KLEINHAUS: So this is my fault. She  
2 has not seen this. I believe, as far as I know,  
3 everything that's responsive to numbers 1 through 4  
4 has been produced in discovery already. But if there  
5 is anything additional, obviously we will get it for  
6 you.

7 BY MR. KNOTT:

8 Q Ms. Terry, the first request is that you bring any  
9 and all records, charts, notes, memos, diaries, or  
10 other writings in your possession pertaining to the  
11 subject action of this lawsuit.

12 Did I read that correctly?

13 A Yes.

14 Q And you've testified that you wrote in a journal  
15 about the events that occurred to you?

16 A I have before, yes.

17 Q Tell me about the journal. What kind of paper is it  
18 on? Is it a bound book?

19 A There was several different notebooks that I would  
20 write different parts that might have bothered me or  
21 different nightmares that I might have had about it.  
22 There was one -- there was one -- there was a  
23 notebook, like a spiral notebook with a black cover.  
24 There was another journal. One of the most recent  
25 ones I had, it was -- it looked like a regular

1       hard-cover book. It's purple and white and speckled.  
2       There is a notebook that I have also that's like a  
3       subject notebook. It has stripes on the front and  
4       then like little flower things that divide the  
5       subject sections that I have written in about it.

6       Q     And in those -- each of those books you have written  
7       about your experience and what you're going through  
8       in your life; correct?

9       A     The experience at the jail that night or something  
10      pertaining to it in that way, yes.

11      Q     Had you ever written anything down about what  
12      happened prior to starting that journal?

13      A     Not that I -- not that I recall.

14      Q     Did you ever complain about your conditions of  
15      confinement in the jail before you were discharged  
16      from the jail?

17               MS. KLEINHAUS: Just object to the form of  
18      the question in terms of what a complaint is, but go  
19      ahead and answer.

20               THE WITNESS: I'm sorry, did you say before  
21      I left the jail did I complain about what was  
22      happening in the jail or what had happened?

23      BY MR. KNOTT:

24      Q     Right.

25      A     Yes.

1 Q And who did you complain to?

2 A I complained to -- while I was -- I guess I'm kind  
3 of -- you mean as far as somebody listening to me  
4 when I complained? I complained to one of the guards  
5 that was in the hospital with me, because there was  
6 like three different shifts of sheriffs that would  
7 sit in the room with me. I don't recall what her  
8 name was. She was there mostly on the first shift.

9 Then, again, when I got back to the jail,  
10 it wasn't so much the night of the birth, but things  
11 that I needed and complained about the treatment of  
12 not getting what I needed. I would complain to  
13 guards, I don't know their names, but they would have  
14 been in whatever pod I was in and complaining away.  
15 Like a specific complaint I had was I don't have  
16 washcloths, I don't have blankets. Can this  
17 please -- can you please get it for me; and things  
18 like that, of that nature.

19 Q You -- what did you complain about to the female  
20 guard in the hospital?

21 A I told her how when I had the baby, I kept screaming  
22 and screaming for help; and the guard, I felt, was  
23 ignoring me and wouldn't call for help and how I  
24 didn't understand why.

25 Q Anything else you discussed with that guard?

1 A I'm sure I did, but I don't recall everything that we  
2 talked about.

3 Q And on how many occasions did you complain that you  
4 needed a washcloth or a blanket?

5 A Once I got back to the jail, every day until I left.

6 Q Anything else that you complained about?

7 A I know I complained about not having like the proper  
8 sized pads for -- because the pads were too small  
9 that they were giving me after I had the baby, and I  
10 asked was there any way I could get larger pads for  
11 postpartum.

12 Q And who did you talk to about that?

13 A I don't know what the CO's name was. I asked a few  
14 different times, a few different occasions. I don't  
15 know what their names were.

16 Q Any other complaints about the conditions of your  
17 confinement in March 2014?

18 MS. KLEINHAUS: Just object to the form,  
19 "conditions of confinement." Go ahead.

20 BY MR. KNOTT:

21 Q Did you communicate any other complaints about your  
22 conditions of confinement in March 2014 to anyone,  
23 other than what we talked about?

24 MS. KLEINHAUS: Same objection. Go ahead.

25 THE WITNESS: I have talked to friends

1           about it. I have talked obviously to my lawyer. I  
2           have talked to -- well, I suppose I already said my  
3           doctor. Just -- yeah, it would just be people close  
4           in my life, like friends, my boyfriend, my lawyer.

5 BY MR. KNOTT:

6 Q       And none of those were reduced to writing until you  
7       started your journals; correct?

8 A       Except for my lawyer and the complaint, correct.

9 Q       And when did you retain counsel for this matter?

10 A      I think it was last spring.

11 Q      And how did you locate the Loevy firm?

12 A      I heard about it on the -- I heard about the firm on  
13      the news because they were representing somebody else  
14      that had a case against Milwaukee County Jail.

15 Q      And up until that time, you had never complained to  
16      anyone other than the times that you have described  
17      in this deposition; fair?

18                   MS. KLEINHAUS: Object to form. You can  
19      answer.

20                   THE WITNESS: I'm sorry, I thought I  
21      answered it. Could you clarify the question again.

22 BY MR. KNOTT:

23 Q      Yeah. We have talked about the complaints that you  
24      had and who you talked to them about while you were  
25      in the jail; correct?

1 MS. KLEINHAUS: Just object to form. Go  
2 ahead.

3 THE WITNESS: I complained about the  
4 condition and the situation while I was in the jail,  
5 correct.

6 BY MR. KNOTT:

7 Q And we've talked about all of those conversations;  
8 correct?

9 MS. KLEINHAUS: Just object to form. Go  
10 ahead.

11 THE WITNESS: As far as I know -- no, I  
12 also -- I'm sorry, I forgot. I also spoke to who I  
13 know to be the nurse practitioner, the OB nurse  
14 practitioner, when I returned back to the jail from  
15 the hospital.

16 BY MR. KNOTT:

17 Q And who is that?

18 A I don't know what her name is.

19 Q And what did you talk to her about?

20 A I talked to her about what happened leaving -- from  
21 the time I came to the jail leading up to the birth,  
22 and then what happened when I got -- well, what  
23 happened while I was at the hospital, and then also  
24 what happened up until the point that I had seen her,  
25 as far as what happened in the jail.

1 Q And what do you mean by what happened at the  
2 hospital, what happened at the jail?

3 A I mean, like what happened at the hospital as far as  
4 when I got to the hospital with the -- after I had  
5 given birth. While I was at the hospital, any, you  
6 know, treatment that I received. And then just not  
7 having what I needed once I came back to the jail.

8 Q Did you keep a journal about these events before  
9 retaining counsel?

10 A Yes.

11 Q When did you start keeping a journal?

12 A I don't know. I have journaled off and on my whole  
13 life, so I don't know specific --

14 Q What journals -- how far back do journals in your  
15 current possession go?

16 A I don't know, I would have to look at them.

17 Q Did you have an agreement with the Loevy firm to pay  
18 their fees?

19 MS. KLEINHAUS: Just object that I think  
20 that invades attorney/client privilege, so I'm going  
21 to direct her not to answer that.

22 BY MR. KNOTT:

23 Q Are you seeking attorneys' fees in this litigation?  
24 Do you know?

25 A I'm sorry, can you state that one more time?



1 Q Do you know if an element of your damages in this  
2 litigation is attorneys' fees?

3 MS. KLEINHAUS: Just object to the form of  
4 the question; but you can answer, if you understand  
5 it.

6 THE WITNESS: I -- I don't know. I don't  
7 know what's -- no, I don't know.

8 BY MR. KNOTT:

9 Q Do you have a written agreement with the Loevy firm?

10 A I have a contract with them, correct.

11 Q And does it require that you pay fees?

12 MS. KLEINHAUS: I'm going to go ahead and  
13 direct her not to answer. I'm not sure how this is  
14 relevant to the lawsuit, but apart from that I think  
15 it invades the privilege, so don't answer that  
16 question.

17 BY MR. KNOTT:

18 Q Do you know how much your attorneys are charging per  
19 hour for work on your behalf?

20 MS. KLEINHAUS: I think that invades the  
21 privilege, so I'm directing you not to answer that.

22 BY MR. KNOTT:

23 Q Did you complain to anyone about the manner in which  
24 you were restrained prior to speaking to the Loevy  
25 firm?

1 MS. KLEINHAUS: Just object to the form of  
2 the question. You can answer.

3 THE WITNESS: I complained of -- yes, yes,  
4 I have.

5 BY MR. KNOTT:

6 Q So this would be a conversation that you haven't  
7 shared with us yet; correct?

8 A I'm not sure what you mean, haven't shared with you.  
9 In what way?

10 Q Tell me who you spoke to about the manner in which  
11 you were restrained before speaking to the Loevy  
12 firm?

13 MS. KLEINHAUS: Just object to the form of  
14 the question. Go ahead and --

15 THE WITNESS: It would have been in -- in  
16 one of those general comments I made about speaking  
17 to friends or my boyfriend, in that manner. The  
18 treatment or the things that happened from the time I  
19 came into the jail until the time I was discharged  
20 from jail completely.

21 BY MR. KNOTT:

22 Q And did the information you saw about the Loevy firm  
23 include information about restraint of pregnant  
24 women?

25 MS. KLEINHAUS: Object to the form. You

1 can answer.

2 THE WITNESS: Yes, that was part of the  
3 news story.

4 BY MR. KNOTT:

5 Q And you never spoke to anyone about your concerns  
6 about your restraints, other than friends, prior to  
7 retaining the Loevy firm; correct?

8 MS. KLEINHAUS: Just object to the form.  
9 You can answer.

10 THE WITNESS: Yeah, no, I didn't speak to  
11 anybody but friends and -- in that manner, yeah.

12 BY MR. KNOTT:

13 Q There is a gentleman waiting in our lobby, I believe  
14 came with you?

15 A Correct.

16 Q And who is that?

17 A Just a friend of mine.

18 Q What's his name?

19 A Troy Bleskachek.

20 Q You might have to spell that.

21 A B-l-e-s-k-a-c-h-e-k, I believe. A lot of times I  
22 spell his name wrong.

23 Q And you're living with your boyfriend's sister at  
24 this time?

25 A Correct.

1 Q How long have you been living there?

2 A For the last few months.

3 Q Where did you live before that?

4 A I was living with a lady named Debbie Lucas before  
5 that.

6 Q What's the name?

7 A Debbie Lucas.

8 Q And who is Debbie Lucas?

9 A A friend of my boyfriend's family. We were renting a  
10 basement room from her.

11 Q Where was that?

12 A In South Milwaukee. I don't recall the exact  
13 address. It was on Missouri Avenue.

14 Q Did you have a permanent home in March 2014?

15 A I did.

16 Q Where?

17 A On South Chicago Avenue. I don't recall the address.

18 Q You would have shared that with anybody who  
19 interviewed you and asked you about your address?

20 A I would believe so.

21 Q You have children?

22 A I do.

23 Q What are their names and ages?

24 A Jeremiah Cholip, Jr.; he is 14. Dayton Lewkowski; he  
25 is 7. And Leland Urbaniak, and he's 4.

1 Q And do you -- well, is the gentleman in the lobby the  
2 father of Dayton?

3 A No.

4 Q Is it the same name?

5 A No.

6 Q I misheard it. Could you spell that name?

7 A Of Dayton's last name?

8 Q Yes.

9 A Lewkowski, L-e-w-k-o-w-s-k-i.

10 Q Do you currently have custody of these three  
11 children?

12 A I have shared custody but not placement of Jeremiah.  
13 I have shared custody with Dayton, but he is placed  
14 somewhere else; and then I do not have custody of  
15 Leland. I voluntarily gave up my custody or parental  
16 rights.

17 Q Has Leland been adopted?

18 A He has.

19 Q Do you maintain contact with Leland?

20 A I do.

21 Q And where does he live?

22 A In Racine.

23 Q When you say you have shared custody of your other  
24 children but not placement, I assume that means that  
25 you still have parental rights, but you do not have

1           those children live in your home any part of the week  
2           or month?

3       A       Correct.   Excuse me one second.

4                       MS. KLEINHAUS:   Sure.   When it's a good  
5           time, can we take a short break.

6                       THE VIDEOGRAPHER:   Going off the record at  
7           1:51 p.m.

8                       (Recess taken.)

9                       THE VIDEOGRAPHER:   We're back on the record  
10          at 2:02 p.m.

11       BY MR. KNOTT:

12       Q       Ms. Terry, we were talking about your children.   Can  
13           you tell me approximately how many hours per week you  
14           spent with your two older children in March 2014  
15           before you were arrested?

16       A       I -- I don't know.

17       Q       Did you have -- did you have placement with them at  
18           all?

19       A       Ever in their lives?

20       Q       No, in 2014 before your arrest.

21       A       No.

22       Q       Have you been married?

23       A       I have.

24       Q       When were you married?

25       A       I got married shortly after I turned 18.

1 Q And who did you marry?

2 A His name was John Terry.

3 Q And was he the father of any of your children?

4 A No.

5 Q Who has custody and placement of Jeremiah?

6 A It's -- his dad has placement.

7 Q And has that always been the case?

8 A Yeah, except for when we lived together, yes.

9 Q And how long after Jeremiah's birth did you live  
10 together?

11 A For approximately four years.

12 Q And so that would have been until approximately 2008?

13 A That sounds about right.

14 Q And then after that you had no custodial or placement  
15 relationship with Jeremiah; true?

16 MS. KLEINHAUS: Object to the form of the  
17 question and asked and answered. You can answer.

18 BY MR. KNOTT:

19 Q True?

20 A True.

21 Q So you're not claiming in this lawsuit that anything  
22 these defendants have done impacted your relationship  
23 with Jeremiah; true?

24 A I am not.

25 Q Is the same true with respect to Dayton?

1 A Be -- I wouldn't -- no, that's not true.

2 Q Dayton was born when?

3 A Dayton is seven years old.

4 Q So 2011?

5 A Right.

6 Q Did you have a relationship with his father?

7 A I did.

8 Q And did you have a custodial relationship with Dayton

9 at any time?

10 A I did.

11 Q When?

12 A Dayton lived with me until he was two, and then lived

13 with me again from January 23rd of last year until

14 July of last year.

15 Q Who has primary custody of Dayton?

16 A Primary placement of Dayton?

17 Q Sure.

18 A He is in a foster home right now.

19 Q And did you have primary responsibility for Dayton

20 until he was two years old?

21 A I did.

22 Q You lost custody of Dayton in approximately 2013?

23 A Placement of him, yes.

24 Q Did you contest that?

25 A I did not.



1 Q And I assume that was because you were -- did not  
2 feel that you were in a position to properly provide  
3 care for Dayton; fair?

4 A That is fair.

5 Q And that was because of your addiction to street  
6 drugs; true?

7 A That was -- that's not completely true, no. That was  
8 part of -- that was part of it.

9 Q And what was the other part?

10 A The situation -- like my legal situation, I had just  
11 gotten arrested for a crime and I was going in and  
12 out of jail.

13 Q Which arrest are you referring to?

14 A The arrest for the case for the possession with  
15 intent.

16 Q And was that prior to March of 2014?

17 A That was.

18 Q So you did not have a placement relationship with  
19 Dayton in March 2014?

20 A I did not.

21 Q True?

22 Do you know when you'd last seen him before  
23 you were arrested?

24 A No, I'm not quite sure specifically, no.

25 Q I think you testified that you began using heroin at

1 age 26?

2 A I think I misspoke on that. Opiates. So, yes.

3 Q What specifically other than heroin?

4 A I was using like Percocet 30s until I started using  
5 heroin.

6 Q And was there ever -- from the time you started using  
7 heroin, was there ever a time when you were sober and  
8 not able to -- and not using heroin before  
9 March 2014?

10 MS. KLEINHAUS: Just object to the form of  
11 the question.

12 BY MR. KNOTT:

13 Q Do you understand the question?

14 A I do understand. There were -- yes, I had periods of  
15 sobriety.

16 Q When was the last period of sobriety before  
17 March 2014?

18 A I don't know specifically.

19 Q How many days consecutively had you used heroin  
20 before you were arrested in March 2014?

21 A I don't know specifically how many days in a row. I  
22 know I was a daily user, if that's what you're  
23 asking.

24 Q Did you feel that your ability to function was  
25 impacted at all by your daily use?

1 A My ability to function in -- as --

2 Q To take care of yourself.

3 A No, I understand what you're saying. My answer to  
4 that would be my ability to function in a normal  
5 societal way was affected by heroin use, correct.

6 Q You lost custody or lost a placement relationship  
7 with Dayton in July of 2017?

8 A Correct.

9 Q And was that stressful for you?

10 A Yes.

11 Q Did it cause you sadness?

12 A Yes.

13 Q Did it cause you anger?

14 A Yes.

15 Q Did it cause you frustration?

16 A Yes.

17 Q And what led to your losing your placement  
18 relationship with Dayton in July 2017?

19 A I was arrested for violation of probation.

20 Q And what did you do that resulted in your arrest for  
21 a violation of probation?

22 A I was in a car that was stopped that had -- a person  
23 in the car had illegal substances on their -- in  
24 their personal property, and that's a violation of  
25 probation.

1 Q You personally had no drugs in your possession at  
2 that time?

3 A I had no drugs in my possession, no, but I didn't get  
4 to finish what I was trying to say before.

5 Q I'm sorry, go ahead.

6 A I was trying to say, I also had drug paraphernalia in  
7 my purse that was also a violation of probation.

8 Q And what was the drug paraphernalia in your purse?

9 A It was heroin paraphernalia and crack cocaine  
10 paraphernalia.

11 Q Were you using those drugs in the summer of 2017?

12 A Yes, I had used those.

13 Q And did that impact your relationship with others?

14 A Not at that point. I had just relapsed.

15 Q And how long before you were arrested had you  
16 relapsed?

17 A Within a few days.

18 Q And were you given a drug screen?

19 A I was not.

20 Q Did you spend time in a jail as a result of that?

21 A Five days, yes.

22 Q And who is your probation officer?

23 A I'm no longer on probation.

24 Q Who was your probation officer?

25 A Mike Peterson.

1 Q And tell me how the events of March 2014 impacted  
2 your relationship with Dayton.

3 A I became more distant from my son, at that point,  
4 Dayton. At that point I had a really hard time  
5 explaining to him that -- I had a hard time  
6 explaining to him that his brother was born in jail.  
7 Kids are just naturally inquisitive, so it was very  
8 hard to explain that, but it was also very hard to be  
9 around my son when I would have flashbacks, so I -- I  
10 didn't see him as much as I normally would have at  
11 that point.

12 Q Was it humiliating to explain to your son that you  
13 were in jail?

14 A No. No, it wasn't.

15 Q So your testimony is that it was not humiliating to  
16 explain to your son that you were in jail, but it is  
17 humiliating to explain to your son that his brother  
18 was born in jail?

19 A Can I elaborate on this?

20 MS. KLEINHAUS: Just answer the question.  
21 I'm sorry, I can't advise you on it.

22 THE WITNESS: My explanation on that is  
23 because the way I explained things to my son is in a  
24 teaching way. Grownups go to jail when they don't do  
25 what they're supposed to, and it was humiliating for

1 me to explain about his brother being born in jail  
2 because I don't know what lesson he could learn from  
3 that.

4 MR. RUSSART: What was the last part of  
5 that?

6 (Testimony read aloud by reporter.)

7 MS. KLEINHAUS: Thank you.

8 BY MR. KNOTT:

9 Q Did you maintain a relationship with Leland in 2014?

10 A I did.

11 Q When did you establish a relationship with Leland  
12 after discharge in -- from the jail? Did you have  
13 parental rights upon discharge from the jail?

14 A I did not.

15 Q In what context did you see Leland in 2014?

16 A I -- I saw him a few times while he was still in the  
17 hospital, and then I had supervised visits with him  
18 through CPS.

19 Q And when did you initiate the -- or someone else  
20 initiate on your behalf the process of terminating  
21 your parental rights to Leland?

22 A I'm not sure of the date, but Leland was about 18  
23 months at that time, so I want to say around -- it  
24 was before I got out of -- I was in jail at that time  
25 as well, so I want to say the conversation came up

1 about August of -- what would that be, 2015? Yeah,  
2 2015, I believe.

3 Q Let me understand. You did not have personal  
4 placement of Leland from the time of his birth for 18  
5 months; correct?

6 A Correct.

7 Q At some point after 18 months you were arrested  
8 again?

9 A Before 18 months.

10 Q Okay. Approximately how long after Leland was born  
11 were you arrested?

12 A Approximately a little over a year.

13 Q And what were you arrested for?

14 A Probation violations again.

15 Q And did that have to do with possession of narcotics?

16 A No.

17 Q What was the probation violation?

18 A Absconding from my probation officer; and then there  
19 was a variety of different allegations, I don't  
20 remember exactly what they were.

21 Q And none of them involved drugs?

22 A It's possible that my probation officer asked me had  
23 I been using drugs or not. I would have been honest  
24 with him. So at that time, yes, I would have  
25 admitted to using drugs, but that wasn't the reason

1 for the arrest, but I believe that was part of the  
2 allegations or the -- I'm sorry, the violations.

3 Q And your arrest at Leland's 18 months of life, at  
4 that time -- I'm sorry, at 11 months, your arrest at  
5 11 months led to you initiating the process of giving  
6 him up for adoption; true?

7 A That -- the arrest wasn't what initiated it. At 18  
8 months that -- in Wisconsin, that's something that is  
9 discussed, if a child is still in -- placed in a CPS  
10 home or facility, that is something that comes up,  
11 and ultimately I decided to give up my rights.

12 Q Your arrest at 11 months contributed to your decision  
13 to give up your rights?

14 A Yeah, I suppose that played a part in it, yes.

15 Q And do you agree that you were arrested due to your  
16 own conduct and not to the conduct of the defendants?

17 A I -- yes, that -- yes.

18 Q And you agree that you were in a vehicle in July of  
19 2017 with paraphernalia in your purse as a result of  
20 your conduct and not the conduct of the defendants?

21 A Yes.

22 Q Leland is healthy?

23 A Yes, for the most part. He has esophageal issues.  
24 But besides that, yes, he's healthy.

25 Q Has anybody suggested to you that the esophageal



1 issues are the result of the circumstance of his  
2 birth?

3 A When speaking to the doctor, that was a concern that  
4 I had and I asked, because I had to clean his throat  
5 out, I had longer fingernails at the time, and I  
6 asked would that have been -- would the esophageal  
7 issues -- he said there was no way of knowing.

8 Q And what doctor was that?

9 A I forget what the doctor's name is. It's through  
10 Children's Hospital.

11 Q When was Leland at Children's Hospital?

12 A It was a doctor's office through Children's Hospital.

13 Q And how many times did you see a doctor at Children's  
14 Hospital with Leland?

15 MS. KLEINHAUS: Object to the form, but you  
16 can answer.

17 THE WITNESS: A few. I mean, there was --  
18 he had quite a few different appointments through  
19 different doctors through Children's Hospitals --  
20 Children's Hospital, I'm sorry.

21 BY MR. KNOTT:

22 Q Were they normal pediatric checkups or did Leland  
23 have some other issue?

24 A A combination of both.

25 Q What other issue did he have?

1 A He had to have surgery on a double hernia. And when  
2 he was born, I don't know what the technical term is,  
3 the little string under his tongue went all the way  
4 to the tip of his tongue, so they had to cut it back.

5 Q Were you told by anyone that either of those  
6 conditions were the result of the circumstance of his  
7 birth?

8 A No.

9 Q Were you told that any of those conditions were the  
10 result of your drug abuse --

11 A No.

12 Q -- during his gestation?

13 A No, sir. Sorry, I didn't mean to interrupt.

14 Q Was -- did Leland go through withdrawals at the time  
15 of birth?

16 A Not at the time of birth that I know of. I know  
17 after birth he went through some form of withdrawals.

18 Q And was that at -- was he treated at Aurora?

19 A He was at Sinai Medical. I don't know if that's an  
20 Aurora facility.

21 Q Say what it is?

22 A Sinai. He was at Sinai, downtown.

23 Q And how long was he in the hospital after you gave  
24 birth?

25 A I believe it was around two weeks or approximately

1 two weeks.

2 Q And was that for -- did he remain in the hospital for  
3 two weeks for any reason other than his withdrawal  
4 from the drugs that you had been using?

5 MS. KLEINHAUS: Just object to form and  
6 foundation, but you can answer.

7 THE WITNESS: Not to my knowledge.

8 BY MR. KNOTT:

9 Q Is Leland autistic?

10 A No.

11 Q When you were pregnant with Leland, did you have fear  
12 that you would be arrested?

13 A Yes.

14 Q And did that fear cause you to change your lifestyle?

15 MS. KLEINHAUS: Object to the form of the  
16 question. You can answer.

17 THE WITNESS: Yes.

18 BY MR. KNOTT:

19 Q How did you change your lifestyle in response to fear  
20 with your pregnancy?

21 A I started living out of a hotel. I'm sorry, I didn't  
22 mean to interrupt. I thought you were finished.

23 Q Go ahead.

24 A I moved into a hotel believing that it would be  
25 harder for police to find me.

1 Q And by that you mean that you knew there was a  
2 warrant out for your arrest?

3 A I did.

4 Q And the warrant was for what?

5 A I believe it was a bench warrant issued by -- by the  
6 judge on my case for not complying with Justice  
7 Point.

8 Q And what was the requirement of Justice Point that  
9 you did not comply with?

10 A I tried to -- it was supposed to be -- I was supposed  
11 to do a urine drop, and I sat there the allotted time  
12 and I wasn't able to go, and I didn't know I was  
13 supposed to go see a judge after that. That was -- I  
14 didn't realize. So I left, and I was informed that I  
15 had a warrant for my arrest.

16 Q So you were required to give a urine sample as a  
17 result of a prior drug arrest; correct? True?

18 A Correct.

19 Q And your testimony is that you were not able to go,  
20 so you left, and didn't understand that that would  
21 result in a warrant; correct?

22 A Correct.

23 Q But you were later informed that you had a warrant  
24 out for your arrest; right?

25 A Correct.

1 Q And you were aware of that on March 9, 2014; right?

2 A Yes, I was.

3 Q And you moved to a hotel in order to help evade  
4 arrest; true?

5 A That is true.

6 Q How were you informed that you had a warrant for your  
7 arrest?

8 A Through speaking with the Justice Point worker.

9 Q And how did you speak to the Justice Point worker?

10 A On the phone, I believe, or voice mail. I'm not  
11 sure. I believe it was some form of telephone  
12 communication.

13 Q When in relation to your arrest on March 9 did you  
14 speak to that Justice Point worker?

15 A I'm not sure.

16 Q You -- where were you living before you chose to go  
17 to the motel?

18 A I was living on Columbia Avenue where I previously  
19 stated in South Milwaukee.

20 Q And why would it be less likely that you would be  
21 arrested if you moved to a hotel?

22 A My thoughts were that the police -- I didn't know the  
23 police in Franklin like I knew different police  
24 officers in South Milwaukee. I wouldn't be as  
25 recognized.

1 Q And while at the motel, you continued to use street  
2 drugs; correct?

3 A Correct.

4 Q Approximately how often per day were you injecting in  
5 March 2014 before your arrest?

6 A I'm not sure. I know I was using daily. At least  
7 twice a day.

8 Q Are you claiming that you're unable to work as a  
9 result of these events?

10 A I'm not saying that I'm unable to work. It makes  
11 work much harder, or it has in the past. I'm sorry,  
12 let me correct that.

13 Q What makes work much harder?

14 A Different things, such as like the flashbacks. That  
15 was a major problem when working.

16 Q Are you claiming --

17 A Before, yeah.

18 Q Are you claiming in this litigation that you lost  
19 wages as a result of the conduct of the defendants?

20 MS. KLEINHAUS: Just object that it calls  
21 for a legal conclusion. You can answer.

22 THE WITNESS: I -- no, I'm not. I guess  
23 I -- I don't know how to answer that exactly, that  
24 I -- I'm sorry.  
25

1 BY MR. KNOTT:

2 Q Do you believe that you have lost income as a result  
3 of the conduct of the defendants?

4 A I don't know if this would be a satisfying answer or  
5 not, but I believe because of what happened as a  
6 result of that night and as far as emotionally, in my  
7 way, it made it more difficult to work, so I don't  
8 know if that's a satisfying answer or not.

9 Q All right. Are you working today?

10 A I -- I work more part time, yeah.

11 Q And where do you work part time?

12 A Through a temp agency.

13 Q What temp agency?

14 A Staffing Partners.

15 Q And what do you do?

16 A It depends on what job -- the job assignment they  
17 send me.

18 Q What primarily?

19 A I have worked in a plastics factory -- I'm sorry, I'm  
20 trying to think of another one that I worked at  
21 primarily. Yeah, I guess that would be primarily the  
22 one that I worked at was the plastics factory.

23 Q When did you last work there?

24 A A few weeks ago.

25 Q And how long have you worked for Staffing Partners?

1 MS. KLEINHAUS: Object to the form. You  
2 can answer.

3 BY MR. KNOTT:

4 Q Or worked through Staffing Partners.

5 A I don't know. Not too long. A few months maybe.

6 Q Were you working in March 2010?

7 MS. KLEINHAUS: Do you mean 2014?

8 BY MR. KNOTT:

9 Q I'm sorry, 2014.

10 A I was not.

11 Q Did you file a tax return in 2010?

12 MS. KLEINHAUS: You mean 2014?

13 BY MR. KNOTT:

14 Q No, go ahead, 2010.

15 A I'm not sure.

16 Q Did you file a tax return in 2011?

17 A I'm not sure.

18 Q 2012?

19 A I'm not sure the last time I filed one was.

20 Q Where had you last worked prior to your arrest in  
21 March 2014?

22 A Sunrise Restaurant.

23 Q What did you do there?

24 A I was a waitress and hostess.

25 Q And did you hold that position when you were



1 arrested?

2 A When I was arrested in March of 2014? Is that --

3 Q Yeah.

4 A No, I wasn't working there at the time of the arrest.

5 Q How long had you worked there?

6 A I worked there off and on since I was 16, so I  
7 don't -- yeah.

8 Q Is that a family-owned relationship?

9 A Not in relation to me, no.

10 Q Okay. Have you worked at Sunrise Restaurant since  
11 2014?

12 A I did.

13 Q And when was that?

14 A I'm not sure the exact date.

15 Q You have referenced flashbacks. When did you first  
16 experience a flashback?

17 A After I went to the hospital from the jail.

18 Q Can you tell me when?

19 A I'm sorry?

20 Q Can you tell me when?

21 A I don't know how many days after I was there.

22 Q And did you tell anybody about it?

23 A I -- I mentioned something about it to the addiction  
24 specialist doctor, but I don't know in how much  
25 detail.

1 Q And I'm talking about during the time that you were  
2 hospitalized at Sinai.

3 A Uh-huh.

4 Q You spoke to the addiction specialist about it? Is  
5 that what you're saying?

6 A I believe so, yes.

7 Q And have the flashbacks changed in their nature since  
8 that day?

9 MS. KLEINHAUS: Objection to form.

10 BY MR. KNOTT:

11 Q More frequent; less frequent?

12 MS. KLEINHAUS: Go ahead.

13 THE WITNESS: I -- at times they are more  
14 frequent than other times, yes.

15 BY MR. KNOTT:

16 Q What is it that seems to make them more frequent?

17 MS. KLEINHAUS: Objection; foundation. You  
18 can answer.

19 THE WITNESS: I don't know what makes them  
20 come on more than other times.

21 BY MR. KNOTT:

22 Q What do you see when you have a flashback?

23 A I see myself primarily back in the jail cell at the  
24 infirmary. It's different at times. Sometimes I'm  
25 screaming at the door for the guard to help me.

1 Sometimes I'm trying not to push and screaming at the  
2 guard that I'm trying to wait for someone to come,  
3 and other times altogether I see my son laying on the  
4 bed in the cell not being able to breathe, and then  
5 sometimes it's a culmination of all of that.

6 Q Do you experience flashbacks while you're awake or --

7 A I do.

8 Q -- are we talking about nightmares?

9 A I don't consider those to be the same thing.

10 Q When did you last experience a flashback?

11 A I don't know the exact date. It was within the last  
12 few weeks when I was at Walmart.

13 Q Any idea who triggered that event at Walmart?

14 A I don't know.

15 Q How often do you have flashbacks, say, in a month?

16 A Again, sometimes it's more frequent than others, so I  
17 can't really answer that truthfully, because some  
18 months it will be four times, some months it will be  
19 ten times.

20 Q How about this year?

21 A I have never kept track of them, that close.

22 Q Do you journal about your flashbacks?

23 A I have journaled about -- yeah, to some degree, yes.

24 Q Has there been any -- have you taken any therapy  
25 other than medications to deal with flashbacks?

1 A No, until recently, besides speaking to the doctor at  
2 Sinai, I -- I really didn't talk about it except for  
3 when I finally talked to Dr. Timothy Allen because I  
4 didn't understand what they were.

5 Q You also experience nightmares?

6 A Yes.

7 Q How often do you experience nightmares?

8 A Now I don't, as long as I take my medication. Before  
9 that, it was pretty much every time I would go to  
10 sleep.

11 Q And I'm sorry, when did you first see Dr. Allen and  
12 start on the medication that addresses nightmares?

13 A Like I said, I believe it was in the last two -- two  
14 years, approximately, that I have been seeing him.

15 Q And you experience nightmares every night from the  
16 time this happened until the time you were started on  
17 medication to address that; correct?

18 A Not just every night. Any time I go to sleep.

19 Q And the medication has been effective such that you  
20 don't suffer nightmares any longer; true?

21 A As long as I take the medication before I go to  
22 sleep. If I fall asleep like on a road trip or  
23 something like that, I still will have the  
24 nightmares.

25 Q Did your impact -- or excuse me.

1 Did your use of street drugs impact your  
2 perception of nightmares?

3 MS. KLEINHAUS: Object to form and  
4 foundation. Go ahead.

5 THE WITNESS: It eliminated them.

6 BY MR. KNOTT:

7 Q And what drugs eliminated nightmares?

8 A Primarily -- I'm sorry?

9 Q Go ahead.

10 A Primarily heroin.

11 Q Any other drugs that you use to address nightmares?

12 A Not nightmares, no.

13 Q Any other drugs that you use to address symptoms that  
14 you think resulted from the conduct of the  
15 defendants?

16 MS. KLEINHAUS: Just object to form and  
17 foundation. I'm going to direct her not to answer  
18 questions about street drugs from after this  
19 incident.

20 BY MR. KNOTT:

21 Q You testified that your use of heroin got rid of  
22 nightmares; correct?

23 A Correct.

24 Q And that was before you got to Dr. Allen; right?

25 A When I was using before I got to Dr. Allen, correct.

1 Q And in your response, you indicated to me, I think,  
2 that your use of other drugs, other than heroin,  
3 somehow impacted your experience of your symptoms; is  
4 that true?

5 A I know what you're talking about, yeah, it is -- yes.

6 Q Is it your testimony that you used street drugs in  
7 order to address symptoms that resulted from the  
8 conduct of the defendants?

9 A I'm sorry, I misspoke on the last question. Can I go  
10 back and explain what I meant? Not necessarily  
11 street drugs, but like medication to help me sleep is  
12 more what I was thinking of when I said -- when I was  
13 speaking about treating or self-medicating for those  
14 symptoms. I'm sorry to go back.

15 Q I'm not sure how far we're going back, but you have  
16 testified that you used heroin to self-treat for what  
17 you believe is distress resulting from the conduct of  
18 the defendants; correct?

19 A At times, yes, correct.

20 Q And I have tried to establish when that is and how  
21 much you were using, and your counsel has instructed  
22 you not to answer.

23 MR. KNOTT: Is that still your position,  
24 counsel?

25 MS. KLEINHAUS: That's my position. We're

1 not seeking damages for any street drug use as a  
2 result of what happened in this incident.

3 BY MR. KNOTT:

4 Q And what drugs did you take to help you sleep and  
5 address your nightmares?

6 A It wouldn't have been for it to address the  
7 nightmares. But sometimes to force myself to go to  
8 sleep, I will take over-the-counter sleep  
9 medications, like NyQuil or sleep aids, things of  
10 that nature.

11 Q And would you still experience nightmares when you  
12 would use those over-the-counter drugs?

13 A Yes.

14 Q Are you alleging that you suffered a physical injury  
15 as a result of the conduct of the defendants?

16 MS. KLEINHAUS: Object to form. You can  
17 answer, if you understand that.

18 THE WITNESS: I -- I mean, the only  
19 physical injury that I know of was the tearing. I  
20 don't know -- I don't know if that was a result of --  
21 I don't know if that would have -- I'm not a doctor.  
22 I don't know if that would have happened had I been  
23 in a hospital or been delivering by myself or if a  
24 doctor was there or not.

25

1 BY MR. KNOTT:

2 Q Are you claiming that your -- that you continue to  
3 experience any physical injury as a result of conduct  
4 of the defendants?

5 A I'm sorry, did you say I continued to experience  
6 physical injury?

7 Q Yes.

8 A No.

9 Q Do you contend that you experience fear after -- that  
10 you continue to experience fear as a result of the  
11 conduct of the defendants?

12 A Yes.

13 Q And what fear? How does that manifest itself?

14 A I mean, I think I said before, you know, the fear is  
15 from the flashbacks, nightmares. But also I have  
16 been to jail since then, and it's -- in way like -- I  
17 have been to jail before this happened, I have been  
18 to jail after this happened, and I'm just afraid of  
19 having any kind of medical issue or when I go to  
20 jail, or when I have gone to jail or medical  
21 emergency, not being treated. I'm afraid to talk to  
22 police sometimes because I'm afraid that they will  
23 find a reason for me to go to jail. But I think that  
24 answers that.

25 Q Anything else in terms of your emotional -- any other



1 emotional damages you're claiming as a result of the  
2 conduct of the defendants? I want to make sure that  
3 we talked about everything that you're claiming in  
4 terms of impact on your -- on you emotionally?

5 MS. KLEINHAUS: I will just object to form.  
6 You can go ahead.

7 THE WITNESS: I'm -- can you say that one  
8 more time? Because I'm not sure I understand what  
9 you're asking me exactly.

10 BY MR. KNOTT:

11 Q Have we talked about all of the emotional symptoms  
12 that you're claiming resulted from the conduct of the  
13 defendants?

14 A Like lasting emotional symptoms or --

15 Q Yeah.

16 A -- even that night?

17 Q No, that you experience today.

18 A Yeah, I believe so, yes.

19 Q Are there any symptoms that -- other than nightmares,  
20 that you experienced in the past that have resolved?

21 MS. KLEINHAUS: Objection to form. You can  
22 answer.

23 THE WITNESS: I -- besides answering the  
24 question, I want to interject, and I don't -- because  
25 I don't think that the nightmares have resolved. I

1 think that with medication I can control nightmares  
2 as far as not having them; but if I don't take it,  
3 it's not resolved.

4 However, to answer your question, is there  
5 any -- you said is there anything else that I'm still  
6 experiencing. Like emotionally that has not been  
7 resolved? Is that correct?

8 BY MR. KNOTT:

9 Q I think we already talked about that, so my question  
10 is anything that you would experience that had  
11 resolved before today.

12 A No.

13 Q Had anyone prior to Dr. Allen diagnosed you with  
14 PTSD?

15 A No, I have never had to -- no, no.

16 Q Any time after the events and before seeing Dr.  
17 Allen, did anyone tell you that you had PTSD?

18 A I have had people suggest that what I was saying to  
19 them sounded like that maybe I should see a doctor.

20 Q But I'm talking about a healthcare provider.

21 A Oh, no.

22 Q Is your memory of the events of March 9 impaired in  
23 any way by use of street drugs?

24 A No.

25 Q You were arrested in, was it, Franklin?

1 A Correct.

2 Q And you were in possession of crack cocaine; correct?

3 A No, I was not.

4 Q Were you charged with possession of crack cocaine?

5 A On March 9th?

6 Q Yeah.

7 A No, I was not.

8 Q And so you had not used crack cocaine immediately  
9 prior to your arrest?

10 A I believe I stated earlier, I used it earlier that  
11 day, but I was not in possession of crack cocaine  
12 when I was arrested.

13 Q Was anybody in your room in possession of crack  
14 cocaine?

15 A I was arrested in someone else's room.

16 Q Was anybody in that room in possession of crack  
17 cocaine?

18 A I'm not sure. I don't know if they found her with  
19 just paraphernalia or if they found her with drugs as  
20 well. I think they may have found her with drugs as  
21 well.

22 Q Had you at any time prior to your arrest experienced  
23 anything that you thought were labor pains?

24 A No.

25 Q Had you --

1 A Not for this pregnancy, no.

2 Q Had you at any time since your release from the  
3 Milwaukee County Jail sought any healthcare  
4 whatsoever before your arrest on March 9th?

5 MS. KLEINHAUS: I will object to the form  
6 of the question, but go ahead.

7 BY MR. KNOTT:

8 Q You were in jail -- the Milwaukee County Jail in  
9 about December of 2013; correct?

10 A I think so, yes.

11 Q And from the time of your discharge from the jail to  
12 the time of your arrest, have you sought any  
13 healthcare whatsoever?

14 A No.

15 Q Were you concerned about the health of your unborn  
16 child?

17 A I was.

18 Q Did it cause you distress that you were using drugs  
19 with a child about to be born?

20 A Did it cause -- I'm sorry, did it cause me distress  
21 that -- because I was using drugs?

22 Q Correct.

23 A Yes.

24 Q And you had been counseled at the Milwaukee County  
25 Jail prior to that, that your use of heroin can have

1 an impact on the child; true?

2 A At the Milwaukee County Jail, I was told that it  
3 could lead to early labor and withdrawals.

4 Q Any other impact?

5 A Not that I remember.

6 Q And the withdrawals would be for the child; correct?

7 A Oh, yes, that's --

8 Q You were aware that the child could be born addicted  
9 to heroin?

10 A I -- that's my understanding of withdrawals, is you  
11 withdraw when your body is addicted to heroin.

12 Q You were aware of that since at least December of  
13 2013; correct?

14 A Correct.

15 Q And you continued to use heroin and crack cocaine  
16 with knowledge that it could cause that impact on  
17 your child; correct?

18 A Yes.

19 Q And you continued to use those drugs by your own  
20 choice and not as a result of conduct of these  
21 defendants; true?

22 MS. KLEINHAUS: Object to form as to the  
23 time frame. Go ahead.

24 THE WITNESS: Correct, nobody made me use  
25 drugs but myself.

1 BY MR. KNOTT:

2 Q And that caused you emotional distress, that you were  
3 continuing to use drugs knowing that it has an impact  
4 on your unborn child; correct?

5 MS. KLEINHAUS: Just object to asked and  
6 answered. You can answer again.

7 THE WITNESS: Yes.

8 BY MR. KNOTT:

9 Q You had experienced a number of miscarriages prior to  
10 March of 2014; correct?

11 A Correct.

12 Q And did you suffer those miscarriages while you were  
13 using heroin?

14 A Not most of them, no.

15 Q Had you ever suffered a miscarriage while using  
16 street drugs?

17 A I believe one miscarriage was while using street  
18 drugs.

19 Q I'm sorry?

20 A I believe one miscarriage was while using street  
21 drugs.

22 Q And when was that?

23 A Before March 2014, but after I was 26. I don't know  
24 exact time frame. Actually, it would have been after  
25 Dayton was born, so that slims it down a little bit

1 more.

2 Q And were you told at that time that your use of  
3 heroin or other street drugs may have contributed to  
4 that miscarriage?

5 A I was not.

6 Q Was it a concern while you were carrying Leland that  
7 your drug use could result in a miscarriage?

8 A No. No.

9 Q Did it cause you anxiety that your use of drugs could  
10 impact your unborn child?

11 A Yes.

12 Q And when you were arrested, you initially gave the  
13 arresting officer two false names; correct?

14 A That is correct.

15 Q And you gave the officer two false names because you  
16 wanted to avoid that bench warrant; correct?

17 A No, I wanted to avoid having my child in jail.

18 Q You gave two false names because you wanted to not be  
19 taken to jail?

20 A Correct.

21 Q Did you ever volunteer your own name?

22 A I don't know if I volunteered it. Not until after  
23 they knew what my name was, I don't think.

24 Q The police report indicates that you had injected  
25 heroin minutes before the police arrived. Do you

1 dispute that?

2 A I do.

3 Q How long prior to the police arriving had you  
4 injected heroin?

5 A Earlier I think I answered that. I don't know  
6 exactly how long, but I know it was daytime.

7 Q And where were you taken after your arrest?

8 A To the Franklin Police Department.

9 Q Were you put in a cell there?

10 A I was.

11 Q Did you see any medical personnel?

12 A I did not.

13 Q Do you know how long you were under arrest before you  
14 were transported to the Milwaukee County Jail?

15 A I don't know specifically. I know that when I was  
16 transported it was again daylight, and I asked the  
17 guard -- or the officer, and they said it was around  
18 lunchtime.

19 Q Were you restrained in any way when you were  
20 transported from Franklin to the Milwaukee County  
21 Jail?

22 A Yes, I was.

23 Q I'm sorry?

24 A Yes, I was.

25 Q How were you restrained?



1 A With handcuffs behind my back.

2 Q And did that cause you any distress?

3 A It was extremely uncomfortable. I mean, I was in the  
4 back of a paddy-wagon being jostled around. It was  
5 hard to keep my balance.

6 Q Did you tell anyone at that time that you shouldn't  
7 be restrained that way because you're pregnant?

8 A No.

9 Q You were arrested with a gentleman named Corey  
10 Toliver?

11 A That is correct.

12 Q Do you have a relationship with Mr. Toliver today?

13 A Today, no.

14 Q Was Mr. Toliver a drug dealer?

15 A He was.

16 Q Did he have access to a car?

17 A Yes.

18 Q At that time?

19 A Yes.

20 Q Did you communicate with Mr. Toliver at any time  
21 after your arrest and before giving birth?

22 MS. KLEINHAUS: Object to the form of the  
23 question. You can answer.

24 THE WITNESS: He was allowed to say  
25 good-bye to me in the Franklin Police Department.

1 BY MR. KNOTT:

2 Q He was allowed to what?

3 A Say good-bye to me. They were releasing him.

4 Q So he was released from custody and you were taken to  
5 Milwaukee County Jail?

6 A Yes, sir.

7 Q And did you speak to anyone when you were in custody  
8 in Franklin?

9 A Besides officers?

10 Q Right.

11 A No, not that I know of.

12 Q Did you speak to anyone other than officers and staff  
13 at the Milwaukee County Jail and Franklin Jail on  
14 March 9 before you were taken to Froedtert?

15 MS. KLEINHAUS: Object to form. You can  
16 answer.

17 THE WITNESS: You said besides officers of  
18 Franklin Jail or jail staff?

19 BY MR. KNOTT:

20 Q Yeah, I'm trying to ask whether you'd spoke to anyone  
21 outside of law enforcement before you were taken to  
22 Froedtert.

23 A Except for the nurse at the jail, no.

24 Q Did you experience anything that you thought might be  
25 labor pains prior to arriving at the Milwaukee County

1 Jail?

2 A No.

3 Q Tell me what you remember about the Milwaukee County  
4 Jail when you arrived there. Tell me -- you felt no  
5 labor pains at that time -- correct? -- when you  
6 arrived?

7 A No. When I arrived, they handcuffed me to a wooden  
8 bench and I saw a nurse shortly after that. Well,  
9 they asked me to pee in a cup and then go see the  
10 nurse shortly after that, and that's when I told her  
11 I was experiencing pressure, and she made the call to  
12 send me.

13 Q So a short time after you arrived at the Milwaukee  
14 County Jail, you were asked to give a urine sample;  
15 correct?

16 A Correct.

17 Q And a short time after that, you saw a nurse in  
18 booking?

19 A Yes, sir.

20 Q And you described for that nurse that you had been  
21 using heroin; correct?

22 A Yeah, that's where I would have told her, I believe.

23 Q And you told her that you had no prenatal care;  
24 correct?

25 A Correct.

1 Q And you felt pressure at that time?

2 A Correct, yes.

3 Q And what did the nurse say to you?

4 A She -- I believe she asked me when my due date was,  
5 and I told her that it was that day. And I don't  
6 remember her saying too much more to me. She went  
7 and spoke to someone else. I was put back on the  
8 bench until I was eventually taken to Froedtert.

9 Q You told her that you were due that day?

10 A Yes, sir.

11 Q And that the word you used when describing what you  
12 were experiencing was pressure?

13 A Yeah, lower abdomen pressure.

14 Q And was it constant?

15 A Yes.

16 Q And that occurred after you arrived at Milwaukee  
17 County Jail?

18 A Yes.

19 Q Did that change at all before you arrived at  
20 Froedtert?

21 A No, I don't recall.

22 Q And you had given birth to two children before this;  
23 right?

24 A Yes, sir.

25 Q So you knew what contraction -- what contractions

1           felt like?

2       A     Yes, sir.

3       Q     You did not describe to that nurse that you were  
4           experiencing contractions before going to Froedtert;  
5           correct?

6       A     No, because that's not what I was feeling.

7       Q     So you did not describe to her that you were  
8           experiencing contractions; correct?

9       A     I don't -- I don't think that it was contractions  
10          that I explained to her. I remember saying feeling  
11          pressure low. I don't remember if I said that to  
12          her. About contractions, I mean.

13      Q     I just asked you that question, and your answer was:  
14          I didn't use that word because that's not what I was  
15          experiencing; correct?

16      A     I'm -- yes, that is what I said.

17      Q     Yeah. And that's the truth; right?

18      A     I'm sorry?

19      Q     That is correct.

20      A     That's not what I remember experiencing, that is  
21          correct. I remember feeling extreme pressure in the  
22          lower abdomen.

23      Q     Had you ever experienced that feeling of pressure in  
24          the lower abdomen during that pregnancy prior to  
25          March 9th?

1 A No.

2 Q Have you ever been told that you were experiencing  
3 pain in the lower abdomen as a result of the child  
4 laying on a ligament?

5 A When I was pregnant with my first child, a doctor  
6 explained the stretching of the ligament, but the  
7 pain I was referring to that night or that day to the  
8 nurse was something I was familiar with when -- in my  
9 other two births, when the baby started dropping  
10 right before labor.

11 Q Okay. So when you arrived at Froedtert, you were  
12 experiencing pressure in your abdomen; correct?

13 A Correct.

14 Q The first written report of a description of what you  
15 were feeling is a Froedtert record that says you were  
16 experiencing tightening. Is that a fair description  
17 of what you were experiencing?

18 A Yeah, the lower abdomen pressure, yeah, that's how I  
19 would explain it. Not like a contraction tightening,  
20 like pressure. Like everything getting tight down  
21 here. But not tightening like a contraction. The  
22 first time that they said something about the  
23 contractions was after they put the belly monitor on  
24 and explained to me that I was having contractions.

25 Q So your testimony is you never used the word

1 "contraction" until you were admitted to the labor  
2 and delivery department at Froedtert and someone put  
3 a monitor on you; correct?

4 A No, I said that was the first time she said it to me.  
5 I don't recall seeing that I was having contractions.

6 Q You never believed you were having contractions prior  
7 to being admitted to Froedtert and being in the labor  
8 and delivery department; correct?

9 A I -- right now, sitting here today, yeah, that's what  
10 I remember, feeling pressure. I didn't -- I don't  
11 think I remember having contractions until she told  
12 me I was having contractions, correct.

13 Q Sometimes a monitor can sense labor contractions and  
14 the mother not feel those contractions?

15 A Okay.

16 Q Do you believe that's what was occurring while you  
17 were on your way to labor -- to the labor and  
18 delivery department at Froedtert?

19 MS. KLEINHAUS: Objection; foundation.

20 BY MR. KNOTT:

21 Q I just want to understand, you did not believe you  
22 were having contractions until someone at Froedtert  
23 informed you of that; right?

24 A I guess the way that I would answer that is, I didn't  
25 disbelieve it. When she told me, I said: Oh, okay,

1           it makes sense, because I felt like I was going into  
2           labor.

3       Q     And so you told the nursing staff at Froedtert that  
4           you felt you were going into labor?

5                       MS. KLEINHAUS:  Objection, I think that  
6           mischaracterizes the testimony, but go ahead.

7                       THE WITNESS:  I -- no, I didn't -- if I  
8           made it sound like that's what I told them, I  
9           misspoke, or that's what I was telling you right now.  
10          What -- they told me that I was -- after doing  
11          certain like tests, whatever, that yes, I was in the  
12          early stages of labor; and it made sense to me  
13          because that was how I felt as well, that I was going  
14          into labor.

15       BY MR. KNOTT:

16       Q     Let's back up.

17                       Do you remember the booking nurse at the  
18          Milwaukee County Jail?  Do you remember what she  
19          looked like?

20       A     No.

21       Q     Was it a nurse that you had ever seen before?

22       A     I honestly don't know.  I don't know.

23       Q     Was it a nurse you ever saw after?

24       A     I don't know.

25                       MS. KLEINHAUS:  When we get to a good spot,



1 can we take another break?

2 MR. KNOTT: Yeah, I want to get through  
3 this line of questioning.

4 MS. KLEINHAUS: Sure.

5 BY MR. KNOTT:

6 Q You did not believe you were in labor while you were  
7 being transported to Froedtert; correct?

8 A I think the best way for me to answer this question  
9 is in my definition of labor, that would -- that  
10 would include the baby dropping to the point where  
11 everything starts to begin.

12 So in my opinion, I felt that I was in the  
13 beginning stages of the baby coming out of my body  
14 and -- in the way of labor.

15 So as far as contractions, I don't -- I  
16 don't recall if I thought I was having contractions.  
17 I don't believe that I felt that way. I felt that  
18 the baby was dropping and this was the beginning of  
19 all of that.

20 Q I assume you didn't talk to the security staff that  
21 was transporting you about your medical condition;  
22 true?

23 A I'm sorry?

24 Q I assume you didn't talk to the medical -- to the  
25 security staff who was transporting you to Froedtert

1 about your medical condition?

2 A Absolutely not.

3 Q And it didn't change -- strike that.

4 Why would you not talk to the security  
5 staff about your medical condition?

6 A That was transporting me to Froedtert already?

7 Q Yeah.

8 A Because in my experience, the transport people don't  
9 talk to you.

10 Q Okay. And do you remember if you were transported by  
11 ambulance?

12 A No, I was not.

13 Q What were you transported in?

14 A Two sheriff's deputies in a sheriff's vehicle, like a  
15 car.

16 Q And they did not communicate with you at all during  
17 that trip; correct?

18 A Not that I remember about medical, no.

19 Q And you do not communicate with them about that  
20 during that trip; true?

21 A I don't remember communicating with them, no.

22 Q And do you remember, were you taken to the emergency  
23 department at Froedtert?

24 A No, I believe I was taken right into like a labor and  
25 delivery, like maternity area.

1 Q Were you experiencing any symptoms of withdrawal on  
2 your arrival at Froedtert?

3 A I remember being sleepy, but that was about it.

4 Q And you would have communicated truthfully and fully  
5 with the nurses who came to take care of you at  
6 Froedtert?

7 A I would have.

8 Q And at least initially you did not tell the nurses at  
9 Froedtert that you were experiencing contractions  
10 when you got there; true?

11 A No, I don't believe that's what I said to them.

12 MR. KNOTT: All right. We can take a  
13 break, Tess.

14 MS. KLEINHAUS: Okay.

15 THE VIDEOGRAPHER: Going off the record at  
16 3:11 p.m.

17 (Off the record.)

18 THE VIDEOGRAPHER: We're back on the record  
19 at 3:30 p.m.

20 THE WITNESS: I just wanted to interrupt,  
21 when I was outside taking a break, I thought of --  
22 it's kind of going back a little far, but when you  
23 had asked me about different treatments that I had  
24 since March 2014, I left one out.

25

1 BY MR. KNOTT:

2 Q Do you recall what question it was that I asked that  
3 you're going to amend your answer?

4 A I don't know.

5 Q What treatment you've had since March of 2014?

6 A Yes.

7 Q Okay.

8 A I would like to add an addition. I went to inpatient  
9 treatment at a place called Arc for five months.

10 Q Okay. And when did you go to Arc?

11 A That would have been from September of 2015 to  
12 February of 2016.

13 Q Spell "Arc."

14 A A-r-c.

15 Q Is that an acronym?

16 A I believe it is, but I don't know what it stands for.

17 Q And where is that located?

18 A It's off of 11th and Madison on the south side of  
19 Milwaukee. It's through the Department of  
20 Correction.

21 MR. KNOTT: And Ms. Kleinhaus, do we have  
22 authorization for those records?

23 MS. KLEINHAUS: You have a -- the  
24 agreed-upon authorization that we negotiated, so you  
25 should.

1 MR. KNOTT: Which I don't think included  
2 any drug treatment, true?

3 MS. KLEINHAUS: I don't know if it did or  
4 not.

5 MR. KNOTT: You don't know that?

6 MS. KLEINHAUS: No, I don't know that.

7 BY MR. KNOTT:

8 Q Okay. So that was -- did you say September of 2015?

9 A I believe so, yes.

10 Q And what caused you to go to Arc in September of  
11 2015?

12 A That was after the violations that I received for the  
13 absconding from my probation officer that I had  
14 mentioned and it was an alternative to revocation. I  
15 told my probation officer when I was talking to him  
16 about the allegations that I wanted to do treatment.  
17 I just didn't know how to get myself into treatment,  
18 and he -- he asked if he could help me get into  
19 treatment, would I follow through. And I said yes,  
20 and that's how I landed up there.

21 Q When you stop using heroin, in your experience, what  
22 symptoms do you experience?

23 A When I'm going through the withdrawal?

24 Q Yes. Do you feel nausea?

25 A I do, I feel nausea, body aches, muscle aches. I get

1 a runny nose, sweats, hot and cold chills.

2 Q Vomiting?

3 A That -- yeah, that's -- yeah, I'm sorry, nausea and  
4 vomiting.

5 Q Diarrhea?

6 A Yes.

7 Q And are those symptoms you experience each time  
8 you're withdrawing from heroin?

9 A In my experience, yes.

10 Q And when you go through that experience, does it make  
11 you feel anxiety?

12 A Yes.

13 Q And does it make you feel that you want to go find  
14 more heroin?

15 A If -- to a point, yes. Yes, if I -- I mean, in my  
16 experience, when I was using and I would go through  
17 withdrawals, using on a daily basis and go through  
18 withdrawals, that would be a driving force to get  
19 heroin, yes. Other times when I would be committed  
20 to quitting, I guess the thought doesn't enter my  
21 head, but --

22 Q When you're a heroin user and you're -- for some  
23 reason not allowed to inject more heroin --

24 A Uh-huh.

25 Q -- you feel anxiety?

1 A Yes, sir.

2 Q And is it anxiety unlike any other anxiety you have  
3 experienced in your lifetime?

4 A I suppose, yes. I mean, all anxiety is a little bit  
5 different depending on the circumstances for me.

6 Q Significant anxiety when you withdraw from heroin;  
7 right?

8 A Yes.

9 Q Do you think that a reasonable police officer would  
10 think that a heroin user, habitual heroin user that  
11 has been arrested, would want to escape custody in  
12 order to use more heroin? Is that a reasonable  
13 assumption in your mind?

14 MS. KLEINHAUS: Just going to object --  
15 BY MR. KNOTT:

16 Q As an experienced heroin user.

17 MS. KLEINHAUS: Object -- excuse me, object  
18 to foundation. Go ahead.

19 THE WITNESS: In my experience, when I have  
20 been arrested I would -- I mean, you know, honestly,  
21 I mean, in my experience, no. I mean, when it gets  
22 to that point, most seasoned officers, in my  
23 experience anyways, can recognize that a person  
24 really isn't in any shape to run away.

25

1 BY MR. KNOTT:

2 Q So in your experience, what, you're physically unable  
3 to run away because you are arrested? I mean, what  
4 do you mean? I'm not talking about you in March of  
5 2014. I'm asking about a daily heroin user.

6 A Okay.

7 Q Isn't it reasonable that an officer should be  
8 suspicious, should be concerned that that daily  
9 heroin user would try to escape custody in order to  
10 continue to use heroin?

11 MS. KLEINHAUS: Just object to foundation.  
12 Calls for speculation and incomplete hypothetical.  
13 But you can answer.

14 THE WITNESS: My best answer to that is I'm  
15 not a police officer. I don't know what a police  
16 officer would think.

17 BY MR. KNOTT:

18 Q But you're an experienced heroin user and you know  
19 what it feels like to go without heroin after you  
20 have been using; right?

21 A I do.

22 Q And it creates a feeling like you want to have more  
23 heroin; right?

24 A Correct.

25 Q And somebody who is a daily heroin user will do many



1 things in order to obtain more heroin and use; true?

2 MS. KLEINHAUS: Just object to form and  
3 foundation. You can answer.

4 THE WITNESS: In my experience, yes, I have  
5 done different things to obtain heroin.

6 BY MR. KNOTT:

7 Q You yourself have broken the law in order to obtain  
8 more heroin?

9 A Yes.

10 Q You yourself in March 2014 moved to a motel in order  
11 to avoid arrest and to keep using heroin; right?

12 MS. KLEINHAUS: Objection; form,  
13 mischaracterizes prior testimony. Go ahead.

14 THE WITNESS: No, that's not -- that was  
15 not my intention for going to a hotel, was to  
16 continue using heroin.

17 BY MR. KNOTT:

18 Q When you went to Arc, were you experiencing  
19 withdrawals?

20 A No.

21 Q You had been in jail?

22 A Yes.

23 Q Did you describe to your counselors how you were  
24 feeling on a daily basis? Did you talk to them about  
25 your desire to use heroin and whether you were

1           overcoming that?

2       A     We had a daily check-in, what our feelings were, a  
3           few times a day, how we felt, whether it was in a  
4           using aspect or in a sobriety aspect, yes.

5       Q     And when you're in treatment, one of the things that  
6           you would discuss with a therapist is anxiety and a  
7           feeling like you don't want to use again; fair?

8       A     Fair.

9       Q     So now I want to go back to March 9 and to quickly  
10          kind of get up to where we are.

11      A     Okay.

12      Q     You had arrived at the Milwaukee County Jail and very  
13          promptly been assessed and approved for transport to  
14          Froedtert Hospital. Do you agree with that?

15      A     I do.

16      Q     It took a very short conversation with that nurse for  
17          you to be transported; correct?

18      A     Correct.

19      Q     Did she tell you that she was concerned that you had  
20          not had prenatal care?

21      A     I don't remember.

22      Q     Did you have any concern whatsoever for obtaining  
23          prenatal care when you are not in the jail?

24      A     When I was pregnant with Leland, no, that's -- I did  
25          but I didn't obtain prenatal care because of the

1 using.

2 Q So fair to say you felt guilty about not obtaining  
3 prenatal care?

4 A Yes.

5 Q And fair to say you felt anxiety about your child and  
6 the fact that you were not obtaining prenatal care?

7 A Yeah, I think I answered that before. Yeah, yes.

8 Q I think we talked about drug use but not lack of  
9 prenatal care.

10 A Oh, okay.

11 Q So I want to show you Exhibit 11. Have you reviewed  
12 any records to prepare for your deposition?

13 A I'm sorry, can you say that one more time? I was  
14 reading. I'm sorry.

15 Q Yeah, let me back up.

16 Did you meet with your attorneys to prepare  
17 for your deposition?

18 A Yes.

19 Q How many times?

20 A Once.

21 Q Did you meet with anyone other than your attorneys to  
22 prepare for your deposition?

23 A No.

24 Q Did you watch any video to prepare for your  
25 deposition?

1 A No.

2 Q Did you review any records to prepare for your  
3 deposition?

4 A No.

5 Q Did you review any diagrams?

6 A No.

7 Q Did you review any deposition testimony?

8 A No.

9 Q Did you review your interrogatory responses?

10 A Yeah, with the -- thumbed through -- I told her I had  
11 gone -- excuse me -- that I had also read through the  
12 initial ones the night before.

13 MS. KLEINHAUS: None of his questions are  
14 intended to get at any conversation you had with me,  
15 so for any additional questions, you don't have to --  
16 just talk about what you reviewed, not any  
17 conversation.

18 THE WITNESS: Okay.

19 BY MR. KNOTT:

20 Q Do you yourself have copies of the -- your medical  
21 records from March 2014 at home?

22 A At home, no.

23 Q At wherever you live?

24 A No, I don't have records myself, no.

25 Q Okay. So I'm trying to understand your prior

1 question, and I don't want to know what your attorney  
2 said to you, but are you saying that you did thumb  
3 through the interrogatory response?

4 A Yes.

5 Q And anything else that you thumbed through to get  
6 ready for the deposition?

7 A No.

8 Q Did you look at the complaint?

9 A No. Or -- I'm sorry, no. I had to think about the  
10 difference.

11 Q Okay. Do you remember whether there was any delay  
12 once you arrived at Froedtert and your being seen?

13 A I don't remember, no.

14 Q Do you remember any delay at the Milwaukee County  
15 Jail after the decision was made to transport you  
16 before you were transported?

17 A I remember them waiting for deputies that could  
18 transport me. That was it.

19 Q And are you in a position today to remember your  
20 conversations with -- with the nurses and doctors at  
21 Froedtert?

22 MS. KLEINHAUS: Object to the form of the  
23 question, but go ahead.

24 THE WITNESS: Not necessarily nurses and  
25 doctors. The woman I remember, I believe she was a

1 doctor, I remember her -- well, not even specifically  
2 talking to me, but she was explaining to the female  
3 deputy that was there about what they had found and  
4 what the plan of action was.

5 BY MR. KNOTT:

6 Q Okay. And you were not yet feeling the results --  
7 you were not yet feeling the symptoms of any  
8 withdrawal when you arrived; is that fair?

9 A Yeah, that's fair. Like I said, I just remember  
10 being sleepy -- overly sleepy.

11 Q Uh-huh. And are you testifying that the doctor never  
12 spoke to you while you were at Froedtert?

13 A I'm -- I'm sure the doctor did speak and ask certain  
14 questions, but I remember the doctor speaking more so  
15 to the deputies than anything.

16 Q What do you remember the doctor saying to -- I think  
17 you said the female deputy?

18 A She explained to her that I was 80 percent effaced  
19 and 2 centimeters dilated. That my contractions --  
20 that I was having contractions, but they were too far  
21 apart. And that if I was on the street coming in on  
22 my own, that she would send somebody like that home  
23 until the labor had progressed farther.

24 Q And you heard a doctor saying that to the female  
25 deputy; correct?

1 A Yes.

2 Q And were you in the room?

3 A The deputy was in the room -- in the room where I  
4 was -- I had been examined, yes, when the doctors --

5 Q Were you in a room by yourself? I mean, was there  
6 only one patient in the room?

7 A Yeah, it was just myself.

8 Q And there wasn't -- it wasn't a curtained room, it  
9 was a four-walled room?

10 A Yes, sir.

11 Q And you were in a bed like we see in hospitals;  
12 right?

13 A Yeah, like an OB bed.

14 Q Which -- describe what you mean by "OB bed."

15 A Where the stirrups come out by the feet and a woman  
16 has to put her feet in the stirrups.

17 Q Were your feet in stirrups?

18 A When she checked me, yes.

19 Q And then your feet were taken out of stirrups?

20 A Yes.

21 Q And it was a female physician who check you; correct?

22 A Excuse me? I'm sorry.

23 Q It was a female physician who checked you; right?

24 A Yes, sir.

25 Q And how long before you left the hospital did you

1 hear that conversation?

2 A I don't know the specific like time frame. I just  
3 remember by the time that I -- well, by the time --  
4 when I got to Froedtert it was maybe a little after  
5 dusk, and when we left Froedtert it was like  
6 nighttime.

7 Q Okay. And is the answer that you don't remember how  
8 long before you were discharged that you heard that?

9 A That's what I'm saying. I don't know hours wise, no.

10 Q Did the doctor ever explain that -- what you  
11 overheard, did the doctor ever explain that directly  
12 to you?

13 A No, I don't remember that being explained directly to  
14 me.

15 Q What's the exhibit number that's in front of you  
16 there?

17 A 11.

18 Q I'm going to talk to you about this labor and  
19 delivery flow sheet. Tell me if you need more time  
20 to read, but I'm going to try to focus you on  
21 particular aspects of it.

22 A Okay.

23 Q I want to look at -- if you read the columns  
24 vertically, I want to talk to you about 2157. It  
25 says --



1 MS. KLEINHAUS: Actually, do you mind if  
2 she just takes a minute to read that column and then  
3 you ask so she doesn't do two things at once?

4 MR. KNOTT: Go ahead.

5 THE WITNESS: (Witness complies.) Okay.

6 BY MR. KNOTT:

7 Q It says -- since you've read it, I will just read the  
8 part I want to ask you about. It says: Patient  
9 states, quote, I just need to get cleared and go to  
10 jail.

11 A Uh-huh.

12 Q End quote. Is that something that you said to a  
13 nurse at Froedtert?

14 A I don't know if I said it to -- I said it to somebody  
15 at Froedtert, because I was asked "well, what are you  
16 here for today" type of question.

17 Q And it says, quote: I think I felt the baby move  
18 twice in the last few hours.

19 Is that something you said?

20 A I don't -- I mean, that's what it says I said, but I  
21 don't remember saying that.

22 Q It says, "I have tightenings in my belly sometimes  
23 but they aren't regular. They hurt, though. The  
24 patient reports tightening start today."

25 Is that something you said?

1 A Again, I don't remember saying that, but that's what  
2 it says I said.

3 Q You don't dispute it; right?

4 A Correct.

5 Q At 2206 on the first page, it says you were sleeping  
6 through a contraction?

7 A Uh-huh.

8 Q Did you sleep much of the time that you were at  
9 Froedtert?

10 A Like I said, I remember being extremely tired.

11 Q And you believe you did fall asleep?

12 A Yes.

13 Q And any idea how long you were asleep?

14 A No.

15 Q And turning the page to 2214, it indicates, "Patient  
16 denies cramping, contracting, leaking of fluids, or  
17 bleeding."

18 Are all of those true statements as of  
19 10:00 at night?

20 A I don't know as of that time at night, but I believe  
21 that -- I remember I didn't -- I don't remember any  
22 of that happening up to that point, no, so that is  
23 believable.

24 Q I'm not sure if you're contesting the record or not.

25 Do you believe that you would have told

1           somebody at 10:00 at night that you were cramping and  
2           contracting? Do you dispute this record?

3    A     I do not dispute it.

4    Q     It says you report -- patient reports occasionally  
5           tightening. Is that something you reported at 10:00  
6           at Froedtert?

7    A     I don't remember that, but I don't dispute it.

8    Q     Dr. Dickerhoff, D-i-c-k-e-r-h-o-f-f. It looks like I  
9           guess she is updated at 10:19. Do you know what type  
10          of specialist Dr. Dickerhoff is?

11   A     No, I do not.

12   Q     There is a Dr. Wanless, W-a-n-l-e-s-s, referenced at  
13          2239. Do you know that doctor?

14   A     No, I don't.

15   Q     Do you remember being encouraged to hydrate?

16   A     No, I don't remember.

17   Q     Turning the page to 2325.

18                   MS. KLEINHAUS: Can you go to the next  
19          page?

20   BY MR. KNOTT:

21   Q     It says: The patient's sleeping in lateral position  
22          upon entering room. I guess that's a nurse entering  
23          the room.

24                   By the way, do you remember Briana Barth,  
25          RN?

1 A I do not.

2 Q Did she seem to you to be -- I mean, do you remember  
3 the nurses you interacted with?

4 A No, I don't.

5 Q In general, do you think that the nursing staff in  
6 the labor and delivery department at Froedtert was  
7 caring and concerned about your condition?

8 A Yes.

9 Q Do you --

10 A One of them, yeah. Go ahead.

11 Q Do you think they treated you differently than any  
12 other patient?

13 A No.

14 Q Do you remember getting an ultrasound?

15 A Vaguely, I guess.

16 Q And do you remember why you got an ultrasound?

17 A No, I don't.

18 Q Turn the page to the column that shows 2341.

19 It says that the fetal heart tone  
20 monitoring strip was reviewed by Dr. Wanless and Dr.  
21 Dickerhoff. Do you remember two doctors reviewing a  
22 strip?

23 A No.

24 Q Moving forward to now 21 minutes after midnight. It  
25 says that there was some blood drawn, I believe, and

1           then it says, "Patient reports pressure low in  
2           abdomen."

3                       Is that something you were reporting at 21  
4           minutes after midnight?

5   A       Again, I don't remember, but I don't dispute it.

6   Q       And if you were reporting that you were experiencing  
7           contractions, you would have told -- strike that.

8                       If you were experiencing contractions, you  
9           would have said that to a healthcare provider; true?

10                      MS. KLEINHAUS:  Objection; foundation.  Go  
11           ahead.

12                      THE WITNESS:  If I realized I was  
13           experiencing contractions, yes, I would have  
14           mentioned that.

15   BY MR. KNOTT:

16   Q       And you were not experiencing contractions as of 21  
17           minutes after -- after midnight on March 10; true?

18                      MS. KLEINHAUS:  Objection; foundation.  You  
19           can answer.

20                      THE WITNESS:  I -- I honestly don't know.

21   BY MR. KNOTT:

22   Q       And there is a report of a vaginal exam at 28 minutes  
23           after midnight by Dr. Dickerhoff and it reports the  
24           data that you quoted earlier.

25                      Do you remember whether you -- that changed

1 at all? Do you remember whether your -- strike that.

2 You know what dilatation is?

3 A No, I don't.

4 Q You know what effacement is?

5 A Oh, I'm sorry, the way you said it. Dilation, yes, I  
6 do know what both of those are.

7 Q And do you know if that changed at all during the  
8 time that you were at Froedtert?

9 A I do not know if that changed. I just remember those  
10 specific statistics given and then somebody saying  
11 that I could walk around a week like that or it could  
12 progress very fastly -- or very quickly.

13 Q And that was a doctor?

14 A I believe it was a doctor, yes.

15 Q And that doctor never said that directly to you, but  
16 said it to a deputy; correct?

17 A That's what I believe, yes.

18 Q And turning to the page that has "312" at the bottom,  
19 at 30 minutes after.

20 A I'm sorry, can you repeat that number one more time?

21 Q I'm sorry?

22 A Can you repeat that number one more time? What page  
23 is it.

24 Q I'm looking at 30 minutes after on March 10. I gave  
25 you the number that's at the bottom of the page too,

1 which is also --

2 A Okay, I got it.

3 Q Which is also page 312.

4 A I got it.

5 Q So to be clear, we're talking about an entry at 30  
6 minutes after midnight?

7 A Uh-huh.

8 Q It says, "Due date verified based on Wheaton eight  
9 week ultrasound." Do you remember having an  
10 ultrasound at Wheaton Franciscan Hospital at eight  
11 weeks?

12 A No. Well, I didn't remember that it was at Wheaton;  
13 but I do remember that's how I discovered my due  
14 date, that I was having an ultrasound at a hospital.

15 Q And you went to get that ultrasound after you were  
16 arrested; correct?

17 A I don't remember.

18 Q You didn't go on your own to get an ultrasound, did  
19 you?

20 A Yes, I did go on my own to get an ultrasound while I  
21 was pregnant.

22 Q With -- with -- in 2013, 2014?

23 A Yes, but I -- I believed it was at St. Luke's South  
24 Shore. I didn't go there for the specific purpose of  
25 getting an ultrasound. I went there stating I

1 thought I might be pregnant, and I hadn't had my  
2 period in such a -- you know, whatever time, and they  
3 did an ultrasound, and at that time they gave me the  
4 due date.

5 Q And so there would be records pertaining to this  
6 pregnancy at you think --

7 A St. Luke's South Shore.

8 Q St. Luke's South Shore, and you have memory going to  
9 that hospital in order to get assessed and it  
10 resulted in an ultrasound; true?

11 A True.

12 Q And it says that the due date was March 18. Do you  
13 see that?

14 A Uh-huh.

15 Q "Yes"?

16 A I do see that, yes.

17 Q And was that the due date that you were told at the  
18 hospital in -- when you had that ultrasound?

19 A The one that I was -- the one that I was speaking of  
20 at St. Luke's South Shore.

21 Q Yeah.

22 A I was told March 10th.

23 Q Any idea why this would report March 18?

24 A I have no idea.

25 Q Did you ever hear from anybody else that your due



1 date was March 18?

2 A Not that I remember.

3 Q At 34 minutes after the hour, there is an entry,  
4 "Strip reviewed and patient okay for discharge to  
5 jail." Correct?

6 A Yes.

7 Q And do you remember a doctor talking to you at that  
8 time and telling you that you were stable for  
9 discharge to the jail?

10 A No, that's actually what I meant before -- right  
11 before I left, they spoke to the deputy and explained  
12 all that to the deputy.

13 Q Do you think it was improper that the physician spoke  
14 to the deputy but not you?

15 A No, I think I would have granted permission.

16 Q At the last page, at 50 minutes after the hour, it  
17 says, "Patient continues to feel mild tightening."

18 MS. KLEINHAUS: I'm sorry, where?

19 MR. KNOTT: On page 313.

20 MS. KLEINHAUS: I'm sorry. Go ahead.

21 BY MR. KNOTT:

22 Q "Patient continues to feel mild tightening." Do you  
23 think that's an accurate description of what you're  
24 perceiving at that time?

25 A I don't remember.

1 Q Do you think it's possible that your perception of  
2 pain from labor was dulled at all by the fact that  
3 you were using -- a heroin user?

4 A I -- at this point, no. The fact of when I -- excuse  
5 me -- used last in comparison to what we're reading,  
6 I don't think so, no.

7 Q Meaning that you had used heroin long -- at a long  
8 enough period before 50 minutes after the hour that  
9 you don't think that heroin would have dulled any  
10 pain at that time?

11 A Correct. At 24 -- I mean, that's at least 24 hours  
12 after the last time I used.

13 Q And it says, "discussed round ligament pain with  
14 patient and encouraged patient to stay well  
15 hydrated."

16 Do you remember having that conversation  
17 with an RN?

18 A No. I mean, it sounds vaguely familiar; but, no, I  
19 don't remember specifically.

20 Q What do you think was meant by "round ligament pain"?  
21 Do you have any understanding what that refers to?

22 A From previous experience, I would think from the  
23 stretching of the ligaments.

24 Q Was the nurse telling you at 50 minutes after the  
25 hour that you were not experiencing labor, but you

1           were experiencing pain in the round ligament from  
2           expansion of your pelvis as you got ready for birth?

3                       MS. KLEINHAUS:  Objection.  Go ahead.

4           Sorry.

5  BY MR. KNOTT:

6  Q       Is that what she was explaining to me?

7                       MS. KLEINHAUS:  Objection to form,  
8           foundation.  Go ahead.

9                       THE WITNESS:  I don't -- I honestly don't  
10       know.

11 BY MR. KNOTT:

12 Q       And it says -- 1:01 a.m., it says, "Printed discharge  
13       instructions and provided copy to patient."

14                       Do you remember given -- being given  
15       papers?

16 A       No.

17 Q       Do you dispute that printed discharge instructions  
18       were provided to you?

19 A       No, I just don't remember being given papers.

20 Q       In your experience, when you are transported from a  
21       jail to a hospital for care, are you allowed to keep  
22       the papers when you return to the jail?

23                       MS. KLEINHAUS:  Objection; foundation.  Go  
24       ahead.

25                       THE WITNESS:  I -- I don't know if you're

1           allowed to keep papers from a hospital or not.

2   BY MR. KNOTT:

3   Q     Do you remember -- strike that.

4                     Do you remember anybody asking you for  
5     discharge instructions once you returned to the jail?

6   A     No.   No.

7   Q     And at 1:02, the last entry by the RN, it says,  
8     "Patient provided with time to ask questions and  
9     denies further concerns." Is that a true statement?

10  A     I don't remember specifically that, no, but it -- I'm  
11     not disputing that, no.

12  Q     So at the time you were discharged from Froedtert,  
13     you were comfortable that you had been seen by  
14     qualified medical professionals; true?

15  A     True.

16  Q     And you trusted their assessment; true?

17  A     True.

18  Q     And they had told you that you are not in labor at  
19     that time; correct?

20                     MS. KLEINHAUS:  Objection to form,  
21     foundation.  You can answer.

22                     THE WITNESS:  My understanding was that I  
23     was in the beginning stages of labor.

24  BY MR. KNOTT:

25  Q     But when you spoke to Nurse Barth, you didn't have

1 any concerns; true?

2 MS. KLEINHAUS: Objection to form and  
3 foundation.

4 BY MR. KNOTT:

5 Q That's what you just testified to.

6 MS. KLEINHAUS: Go ahead. In that case,  
7 asked and answered.

8 THE WITNESS: Right, I don't -- right, but  
9 I'm saying I'm not -- I'm not saying that I didn't  
10 say that, but I'm saying, there wasn't much more to  
11 be concerned about at that point. I'm getting  
12 cleared to go to jail, I'm in the beginning stages of  
13 labor, they are going to send me -- like I said, my  
14 understanding was even if I came in off the street in  
15 the same -- at the same very time, they would have  
16 sent me away to watch the progression of labor, so  
17 there was no more concern. It is what it is.

18 BY MR. KNOTT:

19 Q Is that what the doctors told you?

20 A That's what I overheard the doctor telling the  
21 deputy.

22 Q And describe the female deputy that overheard that.

23 A I know specifically that deputy, actually.

24 Q Who was that?

25 A Deputy Armstrong.

1 Q Say it again.

2 A Deputy Armstrong.

3 Q How do you know Deputy Armstrong?

4 A From being in another Milwaukee County Jail.

5 Q And on what other occasions had you interacted with  
6 Deputy Armstrong?

7 A Just being in and out of jail, I knew who she was.

8 Q Are you saying that you had a problem with Deputy  
9 Armstrong previously?

10 A No, never.

11 Q Was she --

12 A I might have seen her in passing or she may have been  
13 a CO in a pod that I was in.

14 Q Did she ever treat with you with disrespect?

15 A Never.

16 Q Did she seem like a kind and concerned person towards  
17 you?

18 A Yes. She seemed like somebody who was doing her job.

19 Q And do you have any reason to believe that she didn't  
20 do her job on March 9th or 10th?

21 A No, I -- I never -- no, I wouldn't think that of her,  
22 no.

23 Q The nurses and physicians at Froedtert were given  
24 time and an opportunity to do a complete exam?

25 A Uh-huh.

1 Q "Yes"?

2 A Yes.

3 Q You were not in physical pain other than the pain in  
4 your abdomen while at Froedtert; true?

5 A True.

6 Q And I have -- I'm looking at Exhibit 10. I put a  
7 copy in front of you. It's a discharge summary.

8 MS. KLEINHAUS: Go ahead and review it.

9 BY MR. KNOTT:

10 Q Yeah.

11 A I'm good, go ahead.

12 Q Have you seen this document before?

13 A It doesn't look familiar.

14 Q It says in the main paragraph, there, above prenatal  
15 course --

16 A Uh-huh.

17 Q -- she had been experiencing intermittent abdominal  
18 cramping since this morning.

19 Is that something you told the physicians  
20 at Froedtert?

21 A Again, I don't remember saying that.

22 Q It's really inconsistent with what you have told us  
23 here today, isn't it?

24 MS. KLEINHAUS: Objection to form.

25 THE WITNESS: Yeah.

1 MS. KLEINHAUS: Sorry.

2 THE WITNESS: That's all right. Like I  
3 said, what I remember today is feeling pressure when  
4 I -- shortly after I got to jail. If this is what I  
5 said or felt, then --

6 BY MR. KNOTT:

7 Q Did your experience of that pressure change at all  
8 during your time at Froedtert?

9 A I don't remember it changing, no, as far as  
10 increasing or decreasing.

11 Q And you would still describe it as that same sort of  
12 pressure lower in your abdomen at the time of  
13 discharge; true?

14 A Yes.

15 Q And it says "prenatal course." It says, "dated by  
16 eight week ultrasound at St. Joseph's." Does that  
17 refresh your recollection as to where you would have  
18 obtained an ultrasound?

19 A No. But perhaps it was St. Joseph's and not St.  
20 Luke's, I'm not sure, but that's where I thought I  
21 had it was St. Luke's.

22 Q It says: OB panel, which I believe is a lab. It's  
23 preliminary. It has some findings. It say: Urine  
24 drug panel positive for cocaine, marijuana, and  
25 opiates.



1 Does this refresh your recollection that  
2 you had, in fact, used cocaine prior to being  
3 arrested?

4 MS. KLEINHAUS: Objection to form. Go  
5 ahead.

6 THE WITNESS: I said that I had earlier  
7 that day.

8 BY MR. KNOTT:

9 Q Okay. All right. I probably misheard you.  
10 Your discharge condition is stable;  
11 correct? That's what it says?

12 A Oh, yes.

13 Q And it says, "Will get prenatal care through the  
14 jail."

15 Did you speak with the guards during your  
16 transport from Froedtert back to the jail?

17 A I don't remember speaking with them, no.

18 Q Did the female officer explain to you what she had  
19 heard?

20 A No, not that I remember.

21 Q Did she describe for you a plan for what would happen  
22 with you?

23 A Not that I remember.

24 Q Tell me what you remember about your arrival at the  
25 Milwaukee County Jail for the second time.

1     A     I remember -- I don't remember going through booking,  
2           like taking the picture and all that. I remember  
3           getting my bracelet and I remember being taken back,  
4           what felt quickly. It felt like I had gone through  
5           pretty quickly after the -- getting back to the jail,  
6           going -- when I say going through to the area past  
7           booking to where a CO gives like a bed roll, so  
8           sheets and blanket. The CO, I remember I was sitting  
9           on a concrete bench, and she was looking for  
10          blanket -- or a blanket because what was there was  
11          just sheets. The blankets weren't there, whatever.

12                     And I remember saying to her something to  
13          the effect like: Oh, this hurts. And she said: Oh,  
14          it gets way worse. I said: Oh, no, I'm going to  
15          have this baby pretty quick. It's not like this is  
16          just normal growing pains kind of thing. She seemed  
17          to dive too deep into the conversation with me about  
18          it. And then she start -- she told me to follow her,  
19          and shortly after that is when we arrived at the SMU  
20          Unit, which I was actually, I remember, feeling  
21          extremely relieved.

22     Q     Okay. Let me break that down.

23     A     Okay.

24     Q     So you arrive back at the jail with two guards;  
25           correct?

1 A Uh-huh.

2 Q "Yes"?

3 A Yes.

4 Q And when you left Froedtert, were you able to walk  
5 out of Froedtert?

6 A I did walk, yes.

7 Q And do you know what I mean when I say the phrase  
8 "active labor"? Do you know what that means?

9 A In my opinion, it's the beginning of childbirth.

10 Q It's experiencing contractions?

11 A Okay.

12 Q If you accept that as the definition, do you agree  
13 that you were not in active labor, experiencing  
14 contractions, as of the time you were transported  
15 from Froedtert back to Milwaukee County Jail?

16 MS. KLEINHAUS: Objection as to foundation  
17 and form, but go ahead.

18 BY MR. KNOTT:

19 Q Let me take the medical term out of it. Were you  
20 experiencing contractions as of the time you were  
21 transported from the hospital back to the jail?

22 A I just remember feeling sore.

23 Q Okay. And it was a persistent soreness, but not a --  
24 something that came and went like contractions; fair?

25 A I don't remember. At that point I don't remember. I

1           just -- I remember it was strong enough to where I  
2           said something to somebody else, which is not like  
3           me. Because when I stated it to the guard that was  
4           giving the bed roll, it wasn't because I thought she  
5           was going to do something about it, I was making  
6           conversation. So for it to be strong enough --

7   Q       Could I --

8   A       I'm sorry.

9   Q       I'm sorry.

10 A       No, go ahead.

11 Q       I think you're getting ahead in time. I'm going to  
12       give you an opportunity to talk about that.

13 A       Okay.

14 Q       I want to talk about the guards took you back to  
15       booking; correct?

16 A       I remember coming in the sallyport. And that's what  
17       I'm saying, I don't remember going through the  
18       booking process after that. Like I -- and maybe my  
19       memory is wrong, but it's like I remember skipping  
20       through all of that.

21 Q       Do you have --

22 A       So obviously -- maybe I missed that part in my  
23       memory, because usually that part takes a long time.

24                   THE VIDEOGRAPHER: Excuse me, counsel, can  
25       we go off the record? I need to change my media

1 card.

2 MR. KNOTT: Sure.

3 THE VIDEOGRAPHER: Go off the record at  
4 4:17 p.m.

5 (Off the record.)

6 THE VIDEOGRAPHER: We're back on the record  
7 at 4:27 p.m.

8 BY MR. KNOTT:

9 Q Ms. Terry, your oldest son is Jeremiah; right?

10 A Correct.

11 Q Do you remember how long you were in labor with  
12 Jeremiah?

13 A I don't remember how long specifically I was in  
14 labor. I remember only how long before I was given  
15 pain medicine.

16 Q And what does that mean?

17 A I was in -- I was trying not to take pain medicine  
18 when I gave birth to either one of my children,  
19 Dayton or Jeremiah. I didn't have pain medicine for  
20 38 hours with Jeremiah, and then I had him shortly  
21 after that, so I'm not sure the exact hours how long.

22 Q And do you know how the size of -- do you know the  
23 size of your children?

24 A When they were born?

25 Q Their birth weights.

1 A Right. I remember, Jeremiah I believe was 21 inches  
2 long and a little over 9 pounds. And then for  
3 Dayton, I believe it was 20 inches long and I want to  
4 say somewhere around 7 pounds. I'm not sure exactly.

5 Q And do you remember how long you were in labor with  
6 Dayton?

7 A Again, I just remember that I waited almost 26 hours  
8 before I got pain medication and then a few hours  
9 after that I had him, or a couple.

10 Q And you did not want to take pain medication during  
11 the delivery of either child; is that what you said?

12 A I was attempting not to, yes.

13 Q But you ended up taking medication in both those  
14 instances; correct?

15 A Correct.

16 Q And you were able to deliver; right?

17 A Yes, both.

18 Q And that didn't trigger a relapse or anything?

19 MS. KLEINHAUS: Objection to form,  
20 foundation. Go ahead.

21 BY MR. KNOTT:

22 Q Yeah, I assume that you didn't want to take pain  
23 medication because of a concern about prior  
24 addiction, is that true?

25 A When I had Jeremiah, I hadn't used drugs like that.

1           When I had Dayton -- for both -- no, that's -- the  
2           answer is no, that's not true, that's not why. I --  
3           the doctor told me that using pain medication could  
4           have certain side effects on the babies, so that's  
5           why I tried not to.

6       Q     And where did you deliver Jeremiah?

7       A     It was an Aurora Hospital in Kenosha. I forget what  
8           the name of it is.

9       Q     Did you live in Kenosha at the time?

10      A     I lived in Caledonia.

11      Q     And where did you deliver Dayton?

12      A     At the Women's Center Hospital in West Allis. I  
13           forget what it's called.

14      Q     Is that West Allis Memorial?

15      A     I believe so.

16      Q     And what OBs delivered Jeremiah?

17      A     Jeremiah was Dr. Drake, and I don't remember the  
18           doctor's name for Dayton.

19      Q     But the doctor who delivered Dayton had told you that  
20           use of pain medication during labor can have an  
21           impact on the child?

22      A     That's what the doctor who delivered Jeremiah said,  
23           and I just stuck with that advice with the delivery  
24           of Dayton as well.

25      Q     And did you have -- strike that.

1 Do you know what an episiotomy is?

2 A I do.

3 Q Did you have an episiotomy with either Jeremiah or  
4 Dayton?

5 A I did.

6 Q One or both?

7 A Both.

8 Q Any other -- I can't remember what the term is. Any  
9 other tools used to assist in the delivery, like  
10 vacuum?

11 A No.

12 Q For either?

13 A No. No, sir.

14 Q And we were kind of walking through the process of  
15 your return to the jail, and you don't have a memory  
16 of or do you have a memory of coming through the  
17 sallyport?

18 A I do remember coming in through the sallyport. And  
19 then -- yeah, and then the next part that I remember  
20 is getting my bracelet put on and being walked to the  
21 area where you were given the bed roll. I don't  
22 remember the booking process.

23 Q But you know that during that process, after your  
24 return from Froedtert, you would have been  
25 fingerprinted and your blood taken?



1 MS. KLEINHAUS: Objection; form,  
2 foundation. Go ahead.

3 THE WITNESS: I mean, that's what's  
4 happened every time I have gone to jail before, so  
5 that's why I'm like I don't know why I don't remember  
6 that part, because obviously my bracelet had my  
7 picture on it -- my picture, excuse me.

8 BY MR. KNOTT:

9 Q So do you think it's in any way related to your use  
10 of drugs that you don't have a recollection of that  
11 occurring?

12 A I believe that it was just a long couple days at that  
13 point.

14 Q And do you remember the nurse that you spoke to when  
15 you returned from Froedtert?

16 A No.

17 Q Anything about that conversation that you can recall  
18 for us?

19 A I don't remember.

20 Q You don't remember anything you said to her or  
21 anything she said to you?

22 A I don't remember talking to the nurse at all, so  
23 neither.

24 Q So is it fair to say your recollection is somehow  
25 coming through the sallyport and then the next

1 recollection is on your way to the infirmary?

2 A Yes.

3 Q And if the record would reflect -- if the record were  
4 to reflect that your vitals were taken on your return  
5 from Froedtert, would you have a reason to dispute  
6 that?

7 A No, that sounds reasonable.

8 Q Now, you referenced a CO that was looking for a  
9 blanket, and you had a conversation with him or her.  
10 I think it was --

11 A Her.

12 Q -- a her.

13 A Uh-huh.

14 Q And where was that conversation?

15 A That was right outside of the booking area. I mean,  
16 it's kind of hard to describe the jail, but it's  
17 right by where the general transport office is and  
18 they lined up bed rolls and then there is a shower  
19 area where they have inmate shower and -- before they  
20 head to different units or pods.

21 Q And did that CO assist in transporting you --  
22 transferring you to the SMU, the special medical  
23 unit?

24 A That was the same.

25 Q That was the same person?

1 A Yes, sir.

2 Q And why was she looking for a blanket?

3 A Because there wasn't one there. There was only two  
4 sheets stacked together. I don't know if there  
5 wasn't any clean or any clean available.

6 Q So the -- she was looking for blankets in the booking  
7 area?

8 A In the -- right before the shower area, where the  
9 blankets and all the laundry for the bed rolls are.

10 Q This was before starting the process of going to the  
11 SMU?

12 A Yes, sir.

13 Q And tell me what you recall about that conversation.

14 A I just remember sitting there and just making  
15 smalltalk with her, telling her like: Oh, this  
16 really hurts. And she -- she responded like: Oh,  
17 girl, it's going to get way worse. And I was like:  
18 Oh, I've had two kids before, I understand. I said:  
19 But, you know, this is the beginning of it all kind  
20 of thing. This is where it all -- you know.

21 Explaining to her I knew I was in the  
22 beginning parts of labor. And she just kind of,  
23 okay, you know, and didn't really say too much after  
24 that, and told me to follow her.

25 And then we got -- like I said, we got to

1 the SMU right before. My last interaction with her  
2 was her telling me that she would try to bring me a  
3 blanket before the end of her shift, before she put  
4 me in the cell.

5 Q Can you describe that CO?

6 A She was --

7 Q Was she an officer?

8 A Yes, sir, with a gray uniform.

9 Q Okay. Which is different than the regular CO;  
10 correct? You understood that person to be an  
11 officer; correct?

12 A A sheriff's deputy, yes.

13 Q Okay.

14 A Well, I've seen her in the jail before, so -- I don't  
15 see them as different. I don't know if they are  
16 different. I thought they were all the same.

17 Q Okay. Fair enough. Can you describe her?

18 A She is a little bit shorter than me, black woman,  
19 glasses -- they are black-rimmed glasses. She had  
20 short hair, kind of salt and pepper colored.

21 Q Approximately --

22 A And maybe a little bit heavier.

23 Q Approximate age?

24 A I'm really not that great with guessing ages. I  
25 would guess a little bit older, maybe 50s or late 40s

1 something, you know, with the salt and pepper hair as  
2 much as -- she had white hair mixed in there.

3 Q And did you observe that person speaking to anyone  
4 about you?

5 A The only person was the CO in the SMU when they  
6 closed the doors -- or when she closed the door  
7 behind me, I saw her give my card to the CO that was  
8 there, and I assume -- I mean, she stood there for a  
9 second. I assumed they were talking about something.  
10 I don't know what.

11 Q Did you say anything to the CO in the SMU on your way  
12 into your cell?

13 A No.

14 Q Had you ever seen that CO before?

15 A No.

16 Q Did you ever see him after?

17 A Yes.

18 Q And where did you see him?

19 MS. KLEINHAUS: Objection to form. Go  
20 ahead.

21 THE WITNESS: I saw him when I was at --  
22 receiving treatment at UCC. I'm trying to think.  
23 There was this last -- maybe September, so 2017,  
24 because I had gone to the jail to retrieve my phone  
25 that was in property from a -- I went to jail

1           overnight and my property -- and my phone was left in  
2           property, so I went there, I pressed the elevator  
3           button and it opened, and the same CO was standing  
4           there, and I just skipped the elevator, but that was  
5           the only other time I saw him.

6   BY MR. KNOTT:

7   Q     Okay. So you saw him at the jail?

8   A     Yes.

9   Q     And he didn't say anything to you?

10  A     No.

11  Q     You had no idea what was on the card that was handed  
12         to that CO; correct?

13  A     I just know that it was my -- I don't know what they  
14         call it. It's for the inmates, like any time they go  
15         anywhere in the jail, there is a card with the  
16         inmate's picture on it, and from what I have been  
17         told, it just documents your movement around the  
18         jail.

19  Q     And how long after -- do you know how long after you  
20         arrived at the jail from Froedtert you were taken to  
21         the SMU?

22  A     I don't know.

23  Q     And as of the time of your arrival at the special  
24         medical unit, had your experience that you described  
25         at Froedtert changed in any way? The pain you were

1 experiencing.

2 A From the time that I left Froedtert until the time  
3 that I got to SMU had it changed? Is that what  
4 you asked? I'm sorry.

5 Q Yes.

6 A Not that I remember at that point, no. It just was  
7 the same feeling.

8 Q It was the same feeling that you had at the time of  
9 your discharge from Froedtert?

10 A Yes.

11 Q When you arrived at the special medical unit, did you  
12 note whether there were other inmates in the unit?

13 A At that time they -- there was no inmates outside of  
14 their cells, no.

15 Q Did you see any inside the cells?

16 A No, your -- no.

17 Q Were they sleeping?

18 A I would assume so.

19 Q But --

20 A At the same time when you're at the jail, you're not  
21 allowed to -- you're not really supposed to look out  
22 your window.

23 Q Do you know the names of any inmates who were in the  
24 SMU that night?

25 A I know a nickname of one of them because that was

1 a -- when I came back from the hospital later, he had  
2 said like, he had mentioned: Oh, that was you  
3 screaming that night? He said: That's crazy. He  
4 said: I thought it was a crazy person.

5 And I knew him from previously being at SMU  
6 in the beginning of the press -- pregnancy.

7 Q What's the nickname?

8 A Ace.

9 Q And had you talked to Ace at any time other than the  
10 conversation you just described?

11 A As far as from March of 2014 until -- like when I  
12 gave birth until after I got back? I don't  
13 understand what you mean "when."

14 Q Well, strike that.

15 Do you know -- do you know the name,  
16 nickname, of anyone else that was in the SMU that  
17 night other than Ace?

18 A No, except for the guard and Ace, no, I don't.

19 Q And did you have a conversation with the CO at the --  
20 in the SMU after you arrived?

21 A No.

22 Q You know -- you know that CO's name?

23 A Yes, I do.

24 Q What his name?

25 A Wenzel.



1 Q And were you able to sleep after you arrived in the  
2 SMU?

3 A No.

4 Q At some point in time, while you were in the SMU,  
5 there was a change in your experience of symptoms;  
6 fair?

7 A Correct. Fair.

8 Q And how long was that after your arrival in the SMU?

9 A I couldn't tell you an exact time. It was a  
10 progressive change.

11 Q So it wasn't a sudden change, it was something that  
12 came on over a period of time?

13 A Correct.

14 Q Was it hours?

15 A I don't know. I mean, the way -- even when I don't  
16 have a clock up, until this point, everything we  
17 talked about I would judge by how it was outside or  
18 what a guard told me. Like when the officer from  
19 Franklin was taking me, it was around lunchtime, or  
20 when I got to Froedtert it was sometime after dusk or  
21 it was dark. In the jail there is no windows. I  
22 don't know how long it took.

23 Q Tell me what occurred after you arrived in the SMU.

24 A It just -- for me, I was starting to -- like I said,  
25 the labor was starting to progress and I was also

1 starting to feel withdrawal symptoms. I started  
2 feeling the contractions pretty strong, pretty close  
3 together. I started with the diarrhea and the  
4 vomiting. When it got to a certain point where it  
5 became unbearable is when I started -- there was like  
6 a call button like in a hospital, in the SMU, and I  
7 started pressing it. It's like a cord off the wall,  
8 and I started pressing the button.

9 Q Okay. Let me talk to you about up to that point.

10 A Okay.

11 Q All right?

12 A Uh-huh.

13 Q So you said that you began to experience symptoms of  
14 withdrawal after your arrival at the SMU?

15 A Yeah, with -- yeah, over time, uh-huh.

16 Q And you believe that was diarrhea and vomiting?

17 A Uh-huh, and then --

18 Q Yes?

19 A And then the hot and the -- see, that part I don't  
20 know if that was withdrawal. I would assume  
21 withdrawal and part of the labor, because I have  
22 experienced it at both times in my life, but the like  
23 hot and cold flashes and the sweating feeling.

24 Q And did that occur before the change in your  
25 experience of symptoms or the perception of pain in

1       your abdomen? Did those symptoms of hot and cold  
2       flashes, diarrhea and vomiting occur before you felt  
3       contractions?

4       A     No, I think it kind of progressed together at that  
5       point.

6       Q     So you think you had the onset of withdrawal symptoms  
7       and progression of labor at the same time?

8       A     Coinciding somewhat, yes.

9       Q     And how long after your arrival in the SMU did you  
10      start to experience diarrhea and vomiting?

11      A     Again, I don't know an exact time.

12      Q     Can you generalize it for me at all?

13      A     I don't know, maybe within 45 minutes to an hour  
14      tops.

15      Q     And at some point those symptoms became, you said,  
16      unbearable; correct?

17      A     The labor -- yeah, the labor symptoms more so than  
18      anything. Because at that point, the labor -- the  
19      labor symptoms and pains kind of trumped the  
20      withdrawal symptoms. And, I mean, I guess that was  
21      more of a concern, an immediate feeling of needing  
22      help and --

23      Q     How long had the feelings that you associated with  
24      withdrawal, how long had those gone on before the  
25      labor symptoms trumped the withdrawal?

1 MS. KLEINHAUS: Objection to form. You can  
2 answer.

3 THE WITNESS: Again, I don't know. Like I  
4 said, up to that point it kind of coincided, so I  
5 really don't -- I don't know, because I --

6 BY MR. KNOTT:

7 Q So you were initially -- go ahead.

8 A What I was going to say, people have told me how long  
9 I was in the cell. I didn't know that for myself.  
10 So from the time I went into the cell and had the  
11 baby, I didn't know that for myself, so I don't think  
12 it would be fair to say that I know it took this  
13 long, because I don't know.

14 Q You don't know because you didn't have a reference  
15 point?

16 A Correct.

17 Q It's not because you were unconscious or something?

18 A No, it's because I had no reference point. There is  
19 no clock, no clear window.

20 Q Yeah. And did you call for the CO to assist before  
21 you used the call button?

22 A No, I used the call button first.

23 Q And if I understand correctly, you sort of tolerated  
24 both withdrawal and progression of labor on your own  
25 before you used the call button?

1 A Yeah.

2 Q And you said the button is like a hospital. What  
3 does that mean?

4 A Yeah, it looks like -- like I have seen them in  
5 hospitals. It's like -- it's a cord connected to the  
6 wall underneath the light, and the cord is kind of  
7 long enough to go to the bed; and then at the end of  
8 the cord is a little plastic -- I don't know, a  
9 little plastic thing you can hold in your hand and  
10 push the button at the tip of it, and that's what I  
11 was pushing.

12 I know in cells in other pods I have been  
13 in, it's a metal -- square metal piece on the wall  
14 that you push a silver button for like an emergency  
15 situation.

16 Q But you're not describing an emergency button in the  
17 SMU that's -- those aren't something on the wall?

18 A No, not the silver ones. I'm saying, that was in a  
19 different one. The one that's in the SMU is the one  
20 that you can hold in your hand and push the tip of  
21 it.

22 Q Then can you communicate through it, talk through it?

23 A No.

24 Q Do you know what happens when you do that?

25 A What -- no, I don't know specifically what I thought

1 was happening. Again, this was just from being in  
2 jail before, was it the red light above my door would  
3 go off, signaling like I need help.

4 Q Did you see the CO do rounds at any time before you  
5 used the call button?

6 A I -- no.

7 Q And did you -- was there any response when you used  
8 the call button?

9 A No.

10 Q Did you ever attempt to talk to the CO through the  
11 door?

12 A Yes.

13 Q And did he come to the cell front?

14 A No, not that I remember him ever coming.

15 Q From -- did it appear that CO Wenzel was able to hear  
16 you when you asked for him initially?

17 A Yes.

18 MS. KLEINHAUS: Objection to form. Sorry,  
19 Go ahead.

20 THE WITNESS: Yes.

21 BY MR. KNOTT:

22 Q Is the -- are the cells configured in a way that if  
23 one is standing outside, they are able to communicate  
24 with somebody inside? I'm talking about the cell you  
25 were in.

1 MS. KLEINHAUS: I understood that. I don't  
2 know. I didn't communicate with anybody through the  
3 door, but -- you know, like have a conversation. I  
4 just know that because the cell the guy was in has  
5 two metal doors with like a glass window in each  
6 door, and I just know I was screaming really loud  
7 thinking like I need to be loud so he could hear me,  
8 and I was pounding on the window of the door, and  
9 that's how -- well, that's not part of the question,  
10 but go ahead.

11 BY MR. KNOTT:

12 Q Were you able to -- before it became unbearable, like  
13 you said, were you able to stand up and use the  
14 toilet --

15 A Yes.

16 Q -- when you vomited or had diarrhea?

17 A Yes.

18 Q Were you able to get water?

19 A Yes.

20 Q And you pounded on the window after you had used the  
21 call button; true?

22 A Yes.

23 Q And you previously, before you pounded on the window,  
24 I assumed you called: Hey, CO, can you help me out;  
25 or something to that effect?

1 A Yeah, I didn't just pound. I was like: Hey, hey, I  
2 need help, can you please -- I was like: I don't  
3 know if my button is not working. And he didn't  
4 respond to me at first, so that's when I started  
5 pounding and I realized at that point he was just  
6 ignoring me.

7 Q You said your -- you told him your buzzer's not  
8 working?

9 A I assumed it wasn't working because I didn't  
10 understand why he wasn't coming to check on me.

11 Q Do you know if it was working or not?

12 A From the fact that it was flashing when I got taken  
13 out of the room, I would assume that it was.

14 Q So you recall that after giving birth, after the EMS  
15 arrived, you were taken out of the room and you saw  
16 it flashing?

17 A Uh-huh.

18 Q "Yes"?

19 A Yes. Sorry.

20 Q So what was CO Wenzel doing when you initially yelled  
21 for him?

22 A When I initially yelled before I banged on the  
23 window, there is -- because his desk, the CO desk is  
24 like right across from the room I was in, and there  
25 is like a big pillar kind of thing that would have



1       been like to his left -- sorry, I will quit moving  
2       around -- that would have been to his left, and he  
3       was kind of arced around like this, because there is  
4       a TV on the other side, and he was watching the TV.  
5       And that's actually how I figured out that he was  
6       just ignoring me, because after a while he just  
7       started going like this, like waving backwards to me.

8       Q     So I know that you can't -- you have a difficult time  
9       estimating how long it was after your arrival that  
10      these symptoms changed, but do you know how long it  
11      was before the delivery that you started to  
12      experience a change in your symptoms?

13      A     Again, I can't tell you exactly how long, but it was  
14      a while, because I still -- even after that, I still  
15      was vomiting and vomiting. I got to the point where  
16      I just felt like I had to take like my pants off and  
17      my underpants off and was vomiting -- going to the  
18      bathroom, vomiting. And I remember at a certain  
19      point I was vomiting and my water broke as I was  
20      standing there vomiting. So, again, I started  
21      screaming.

22                 Shortly after that, I just felt the need  
23      like I needed to lay down, and I remember still  
24      having contractions. And I don't know, I mean,  
25      honestly, I must have -- I must have counted off at

1       least ten contractions, like trying to breathe  
2       through them, because I kept holding onto the railing  
3       next to me. And like: Okay, breathe through this,  
4       you will get through this, somebody is coming.

5               And I remember thinking like -- see, that's  
6       another reason why I have a problem with the time,  
7       because I remember when I was in the SMU before, the  
8       medical staff kept coming in so much it got like  
9       almost annoying. Like they were literally coming to  
10      everybody's cells. So I'm thinking: Well, they are  
11      going to come, they are going to come. So it just  
12      seemed like forever, like why are they not coming.

13             So it just -- it's really hard to make a  
14      reference, but it was quite a while because there was  
15      quite a bit of stuff in between.

16   Q       Okay. So you have said a lot.

17   A       Sorry.

18   Q       Just to kind of roll this backwards, in the past,  
19      when you had been in the SMU prior to this  
20      incarceration, the medical staff came so often that  
21      it became annoying to you?

22   A       Almost, yeah. Because they would come in our cells  
23      and physically check on us.

24   Q       And you expected that someone from the nursing staff  
25      would come and check on you in the cell; correct?

1 A Yes. Or that that other CO would bring a blanket or  
2 something.

3 Q Did the blanket ever arrive?

4 A No.

5 Q And was it after you were pounding on the window that  
6 you felt the need to take your pants and underpants  
7 off?

8 A Yeah -- yes, after the second time I was pounding on  
9 the window because my water -- no, wait, how did it  
10 go. I took my pants off, I was puking, and then my  
11 water broke, so it was after the first time of  
12 pounding on the window I took my pants and underpants  
13 off and my water broke. It didn't -- yeah.

14 Q And the interaction that you described with CO Wenzel  
15 where he used his hand to kind of brush you off, was  
16 that before you took your pants and underpants off?

17 A Yes.

18 Q And your testimony is that he -- well, strike that.

19 Just to get the visual picture, the window  
20 to the cell you were in was how far from -- from CO  
21 Wenzel?

22 A The window that I was at?

23 Q Yeah.

24 A I don't know, maybe 6, 7 feet.

25 Q Shorter than the distance of this conference room

1 table?

2 A Probably from here to the wall, so if I'm wrong in my  
3 distance, but --

4 Q And his back was to you?

5 A Yes.

6 Q And are you describing him leaning sort of on his  
7 right hand?

8 A Yes.

9 Q On his elbow?

10 A Yes.

11 Q And you pounded --

12 A Uh-huh.

13 Q -- and he waved you off; correct?

14 A Yes.

15 Q And is it your testimony that he never came to the  
16 window to look at you at all?

17 A I don't remember him coming to the window to talk to  
18 me or look at me, no.

19 Q Did he -- do you have a recollection of him ever  
20 standing up from his chair before he came to your  
21 cell to discover that the child had been born?

22 A No.

23 Q You don't think he ever did stand up?

24 A I didn't -- no. Nope.

25 Q Is there any question in your mind that CO Wenzel

1 could hear you when you were pounding and yelling?

2 A No.

3 Q And did you do that pounding and yelling on more than  
4 one occasion or --

5 A Yes.

6 Q And how long -- how many occasions did you do that?

7 A The pounding and yelling? At least three times. The  
8 yelling, even from the bed, at a certain point got  
9 consistent. I just was in there screaming like is  
10 somebody going to help me, please I need help, up  
11 until the point of pushing.

12 Q And are you able to estimate for me in any way the  
13 period of time from when your water broke to the time  
14 when you started to push?

15 A Not -- not really. I mean, I wouldn't guess too much  
16 more than a half hour, 45 minutes.

17 Q And did you at some point in time try to push the  
18 baby out?

19 A I -- yes, I tried to hold back contractions and I was  
20 screaming that as well, and then I started screaming  
21 I couldn't hold it anymore and needed to push.

22 Q Do you know how many active voluntary pushes by you  
23 were required to deliver the baby?

24 A Three.

25 Q And how much did the baby weigh?

1 A I don't remember. I want to say like six something.

2 MR. ARNOLD: I'm sorry, did you say  
3 three --

4 THE WITNESS: Yes.

5 BY MR. KNOTT:

6 Q And when you said before that there were something  
7 like ten contractions, did you say that?

8 A I said I did a ten count, because you asked how --  
9 that was in reference to how long something was, and  
10 that was because I was counting contractions holding  
11 on, like okay, breathe through this one, breathe  
12 through this one.

13 Q So you were counting to ten through contractions?

14 A No, I counted ten contractions. As I was holding on  
15 trying to breathe through them, okay, that is one  
16 down. All right, we can get through this next one.  
17 You know, like that.

18 Q And was it -- are you saying that it was ten  
19 contractions before the baby was delivered?

20 A No, I'm just -- I'm saying at that -- whatever the  
21 question was, you asked me how long was that. I  
22 said, well, there was at least this amount of time in  
23 between because I know that there was ten  
24 contractions, but I had been puking before that,  
25 because you asked how long between -- I forget

1 exactly what the question was, but that was in  
2 reference to time.

3 Q And did you ever hear any of the other inmates in the  
4 SMU at all that night?

5 A No.

6 Q From your perspective, or as far as you know, they  
7 were sleeping?

8 MS. KLEINHAUS: Objection; foundation. You  
9 can answer.

10 BY MR. KNOTT:

11 Q You didn't -- strike that, that's a bad question.

12 A Yeah, I just --

13 Q You didn't hear anything from them?

14 A No, I -- honestly I don't know how I could have heard  
15 anything from another cell, the way I was screaming.

16 Q Okay. And tell me what happened when you delivered  
17 the baby. So you pushed three times and the baby was  
18 delivered?

19 A Well, it started with the pushing. I screamed at  
20 him, I'm like: I have got to push, I have got to  
21 push, I can't hold it anymore.

22 I pushed the first time. The second time I  
23 pushed and it was like an explosion of blood, which  
24 scared the crap out of me because I had a mirror to  
25 watch my other two children born, and I never seen

1 anything like that, so I'm screaming, like there is  
2 blood, there is blood, please help me, please help  
3 me. I pushed the third time and the baby came out  
4 and I'm just like looking at him like what -- you  
5 know, I was just in shock, like what just happened.

6 And then I started screaming: The baby is  
7 here, the baby is here, please help me, help me. And  
8 I stopped screaming because I see the baby kind of  
9 like shaking, and I'm like -- I'm looking at him, and  
10 he's blue and he's trying to breathe and making like  
11 a gurgling noise, like (witness makes noise). And  
12 I'm thinking, I'm like, he can't breathe, you know,  
13 and I'm like trying to figure out like what am I  
14 supposed to do, because obviously nobody is coming.  
15 These people don't care.

16 So I'm like going over options in my head.  
17 Ultimately I decided that I'm going to have to stick  
18 my finger down his throat and clear the mucus out.

19 And I did. And I wrapped him in a sheet,  
20 and he started breathing. I held him for a little  
21 while, and that's the first time that I saw the CO  
22 finally like cup his hand at my door. And I could  
23 hear -- actually, yeah, going back to your other  
24 question, I could hear him right there say, "oh,  
25 shit." And then I heard him grab the walkie-talkie



1 and say "medical all call."

2 And the next thing I remember was a little  
3 while -- it wasn't like a little while, like long,  
4 but a few minutes later I saw the first nurse arrive  
5 at the door -- the outside door, and I heard her too  
6 say "pop the door."

7 And then she held the door open, and  
8 another nurse ran in front of her and opened that  
9 door. And she came in and she said, "hell, no, I'm  
10 not cutting no umbilical cord."

11 And I was like: Well, do you want me to  
12 chew it apart, because I've like pretty much done  
13 everything here, can I please get somebody to help  
14 me.

15 The next thing I remember after that was  
16 the EMTs moving me to a gurney, like picking the  
17 sheet up and moving me over.

18 Q Do you believe that you were unconscious at some  
19 point?

20 A I do.

21 Q And obviously you wouldn't know how long you were  
22 unconscious?

23 A No.

24 Q And CO Wenzel, if I recall correctly, you had never  
25 seen him before that night?

1 A No.

2 Q And do you have any reason to think that he disliked  
3 you for some reason?

4 A I know that went through my head that night, like  
5 what the hell is wrong with this guy. I'm thinking  
6 like -- I don't even know this dude, you know, why  
7 won't he call somebody.

8 Q Ms. Terry, we can get you Kleenex. I'm sorry.

9 A That's fine.

10 MR. KNOTT: Can we just take a break?

11 MS. KLEINHAUS: Sure.

12 THE VIDEOGRAPHER: Going off the record at  
13 5:09 p.m.

14 (Recess was taken.)

15 THE VIDEOGRAPHER: Back on the record at  
16 5:11 p.m.

17 BY MR. KNOTT:

18 Q I won't ask you to continue on with your answer or  
19 ask that question again.

20 A Okay.

21 Q I just want to ask, as far as you know, CO Wenzel had  
22 no personal dislike of you?

23 A No.

24 Q And did you ever see another correctional officer or  
25 anyone else enter the special medical unit after you

1 arrived and before you gave birth?

2 A No.

3 Q And if CO Wenzel's supervisor were to have testified  
4 that she was in the SMU minutes before you gave  
5 birth, you would dispute that?

6 A Yes.

7 Q You didn't see anybody walk around the SMU the entire  
8 time you were there?

9 A No.

10 Q And --

11 A I'm sorry, can I amend what I just said? I guess --  
12 okay, yeah, I didn't see anybody walk around there.  
13 And I guess the point why I would dispute that would  
14 be like if it was a supervisor, why wouldn't they  
15 have done something, because I know at that point I  
16 was screaming, except for the pushing. But I know  
17 that too, I have seen lieutenants do rounds, and in  
18 my experience they take much more time than a regular  
19 CO to actually look in each cell. And I didn't  
20 experience that, so I think I would have noticed it  
21 because I was facing the door, but -- sorry, go  
22 ahead.

23 Q Okay. The baby was delivered; you heard a gurgling  
24 noise. Did you then take the baby from between your  
25 legs and bring it up to your breast?

1 A No. I cleaned his throat. I cleaned his throat  
2 while he was still on the bed between my legs. I  
3 didn't pick him up until after that. Because he --  
4 when he came out, he kind of like landed there on his  
5 side. I was -- to be honest, I wasn't expecting him  
6 to come out, so it was like shocking. But yeah, I  
7 cleaned his throat out there and then wrapped him up  
8 in a sheet, and then -- yeah.

9 Q Okay. So you're describing sort of sitting up. You  
10 sat up in order to reach the baby?

11 A Yes.

12 Q And you took your sheet and wrapped the baby up?

13 A Yes.

14 Q And you had cleared the baby's throat?

15 A Uh-huh.

16 Q "Yes"?

17 A Yes, yes, I'm sorry.

18 Q Using your finger?

19 A Yes.

20 Q And did it -- did that cause the gurgling sound to  
21 stop?

22 A It did.

23 Q And did the baby appear to be in distress after you  
24 cleared its throat?

25 A No.

1 Q It was pink and warm after you cleared the baby's  
2 throat?

3 A It took a little bit, but he became to -- I don't  
4 know about warm, but I'm assuming -- I mean, he -- he  
5 did turn pink from a bluish color. I don't know  
6 about warm, because I had already had him wrapped in  
7 a sheet, and still at this point the blood was still  
8 pretty warm, so I couldn't -- yeah, I wouldn't have  
9 known. I don't know.

10 Q And did you continue screaming?

11 A No, not at this point. I screamed a couple of times  
12 after he came out before I cleaned his throat, but  
13 not afterwards because I just felt like -- when I was  
14 screaming, there was such an out loud echo, and I  
15 just felt -- I felt like what the hell. You know,  
16 like he's little, I just felt like I already -- like  
17 I didn't want to hurt him anymore.

18 Q So you had stopped screaming. Did you press the  
19 button again?

20 A No.

21 Q So you never pressed the button after the birth?

22 A No.

23 Q And, again, are you able to estimate the amount of  
24 time after the birth before the CO came to your  
25 window?

1     A     I don't know how many minutes -- it wasn't like hours  
2           or anything like that. It was within some amount of  
3           minutes, because I remember looking at the baby when  
4           he started turning pink, and he was just laying  
5           there. He was breathing peacefully, and then at a  
6           certain point he started to cry. And I don't know,  
7           he cried for a few minutes, and then the CO came to  
8           the door.

9     Q     And are you able to estimate -- well, strike that.  
10                    You said it was a matter of minutes. Would  
11           you say it was less than 10 minutes after birth  
12           before the CO came to the door?

13    A     I don't know, maybe 10 or 15 minutes.

14    Q     I'm sorry, what was --

15    A     Maybe 10, 15 minutes.

16    Q     And you heard the CO use his radio or his microphone  
17           in order to call for more assistance; right?

18    A     Yeah, I saw him pick it up off his hip and I heard  
19           him, yes.

20    Q     And you heard him say before that "oh, shit"; right?

21    A     Yeah, when he cupped his hands at the window.

22    Q     And did he say anything else?

23    A     That's all I heard was "oh, shit," and then he said  
24           the medical all call thing in the walkie-talkie.

25    Q     And how long from that call until you started to hear

1 an emergency response?

2 A As far as the emergency response, like I said, all I  
3 saw or heard was a few minutes later -- maybe, I  
4 don't know, five, six minutes later is when that  
5 nurse got there to the first door and said: Pop the  
6 door, pop the door. They popped the door, and then  
7 the second nurse ran past her, and that door opened  
8 in, and then that was when she was like: Oh, hell,  
9 no, I'm not cutting no umbilical cord.

10 Q Did they -- did you ask them whether they should cut  
11 the umbilical cord?

12 A No, not -- No, I just asked them, like, well, can you  
13 please get somebody to help me, like I did the hard  
14 work, I can't chew it apart. I remember being --  
15 like making a smart aleck remark like that, like are  
16 you kidding me.

17 Q And how many nurses responded, if you recall?

18 A At that point I only saw the two of them. And once I  
19 saw them come in the door and then said, "well, can  
20 you get somebody to help me" is when I just felt  
21 like -- I remember just feeling like a wave of  
22 relief. Like, okay, like somebody is here now, and  
23 I -- I think that's when I passed out the first time.

24 Q And your next memory is you were loaded on an EMS  
25 cart?

1 A Yeah. Yes.

2 Q And you were taken to Aurora Sinai?

3 A Yes.

4 Q And did you receive all the care that you felt you  
5 needed at Aurora Sinai?

6 A Yes.

7 Q Did you tell the doctors and nurses at Aurora Sinai  
8 what had happened?

9 A You mean like when we got there?

10 Q Yes.

11 A No, I was in and out of consciousness. I don't --  
12 there were many stories floating around I know.

13 Q Do you remember being -- do you remember being in an  
14 ambulance going to Sinai?

15 A The only thing -- yeah, I do. I remember looking  
16 down, and that's when the EMT told me the baby was on  
17 my chest. And I said something to the effect of  
18 like, you know, don't let him fall off. And I looked  
19 at him, and that's -- he had like paper towel on him?  
20 And I was like: Why does he have paper towel on him.  
21 And the EMT guy was like: Well, the County wouldn't  
22 let us take the sheet, or something like that. And  
23 that's when I passed out again, and that's when I  
24 remember waking up in the hospital.

25 Q Do you remember any security officers in the



1 ambulance on your transport to Sinai?

2 A No, I don't.

3 Q Do you remember if you were restrained in any way in  
4 your transport?

5 A I don't remember. That's not true, I do remember  
6 seeing a strap right here from the gurney, but that's  
7 all I remember.

8 Q Okay. So the ambulance gurney had like sort of a  
9 seatbelt; is that what you're saying?

10 A Yeah, kind of like it looked like a seatbelt.  
11 Anything below there, I don't know.

12 Q And you were seated in kind of the upright position  
13 in the gurney or were you laying flat?

14 A No, I was laying flat.

15 Q I'm sorry, and the baby was on your chest?

16 A Yes, sir.

17 Q And then you passed out again?

18 A Yes.

19 Q And you -- do you remember anything in the emergency  
20 room? Do you remember any conversations you had  
21 there?

22 A I remember two women, if I had to guess, they were  
23 nurses, being towards like waist down of me. And  
24 they were -- excuse me, I remember them massaging  
25 like my lower abdomen. And I'm looking, I'm like

1       where is the baby, and they like -- they explained to  
2       me he was on my right-hand side. He was fine. The  
3       doctors were working on him and putting medicine in  
4       his eyes.

5               And that -- I remember saying something  
6       like: Oh, you cut the cord. And she is like: Yeah,  
7       you know, now we have to get your help for the rest  
8       of it. And then I said: Oh, I know this part. Like  
9       I remember before, with my other two children, I was  
10      like this is getting the placenta out. And I was  
11      like: Oh, this is the best part. I'm sorry, I don't  
12      mean to laugh. But she was like: What? Everybody  
13      hates this part. And I'm like: Just get it out of  
14      here. Just get it out.

15             Like I was just like this has been an  
16      ordeal, just get it out now. And then the next thing  
17      I remember is being -- waking up in my room, like a  
18      regular hospital room.

19   Q       And were you given pain medication at that time?

20   A       I don't know. I know -- I know that once I was awake  
21      and could make up my own mind, I refused pain  
22      medicine, like narcotic pain medicine.

23   Q       I'm sorry, you said once you were awake you refused  
24      narcotic pain medication?

25   A       Yes.

1 Q Did the nurses talk to you at all about why they  
2 didn't want you to deliver the placenta at the jail?  
3 Did they say anything to you? And I mean the jail  
4 nurses.

5 A No.

6 Q Did anyone at any time after that birth tell you that  
7 the rapid delivery was related to the drug use?

8 A No. I was actually told that it may have been  
9 because it was my third child. But, I mean, nobody  
10 else was there, so who knows, but -- that was  
11 strictly a guess in my opinion. I mean, it was a  
12 doctor that said it. But, again, I just -- I  
13 don't -- I don't know what it was.

14 Q Of the nurses that responded to the SMU cell, did any  
15 of them -- were they rude to you or disrespectful to  
16 you?

17 A The only one that -- I mean -- well, besides the  
18 nurse saying "pop the door," the only one that I  
19 remember really talking to where I can remember what  
20 she said was -- I mean, I felt like it was rude,  
21 like, "Oh hell, no, I'm not cutting no umbilical  
22 cord." But I guess I felt like it was rude because I  
23 have just been sitting there screaming for how long.  
24 Obviously like how is this not a medical emergency.  
25 Like you guys are medical people. That's how I felt.

1           So I did feel disrespected in that way.

2       Q       Bear with me just a second here.

3                       So I want to show you Exhibit 12.

4       A       Okay.

5       Q       And those are responses to interrogatories that we  
6               had sent to you.

7       A       Okay.

8       Q       And do you recall providing information for a  
9               response to these?

10      A       I do.

11      Q       And you tried to provide complete and accurate and  
12              truthful responses at that time?

13      A       At that time, yes.

14      Q       And at question 5, one of the things that we asked  
15              you was did you receive treatment or counseling for  
16              drug addiction or abuse at any time between  
17              January 1, 2012 and December 31, 2015.

18                       And we didn't receive any identification of  
19              treatment providers in that response. Do you see  
20              that?

21      A       I do.

22      Q       And today you have talked about treatment that you  
23              have obtained at UCC?

24      A       UCC was just recently. This -- the only one that I  
25              had between these dates would have been Arc, and I

1 just simply forgot about it until just a little while  
2 ago, and I told you about it.

3 Q Arc I think you told me was in -- was it 2015?

4 A Yes, September 2015 to February 2016.

5 Q Is it your testimony that you didn't receive any  
6 therapy or treatment for drug addiction, counseling  
7 for drug addiction or abuse at any time between  
8 January 1, 2012 and December 31, 2015, except for  
9 Arc?

10 A I'm trying to think of the date it would have been.  
11 I guess maybe I didn't think of that either. Like I  
12 had -- I was on Methadone in that period of time as  
13 well. It would have been -- um, give me one second  
14 to try to think of the dates -- approximate dates.

15 I think July of 2013 is when I stopped  
16 going to the Methadone Clinic, and then before that I  
17 started in maybe October of 2012.

18 MR. KNOTT: Counsel, are we going to be  
19 provided authorizations to obtain her treatment in  
20 counseling?

21 MS. KLEINHAUS: We contend it's not  
22 relevant to damages. We're not seeking damages for  
23 any self-medication as a result of this incident that  
24 may have been done via Methadone, so that's our  
25 position. We allowed her to answer all the questions

1 about everywhere she got treatment.

2 MR. KNOTT: This is the problem, I don't  
3 know where you -- I don't know where she got  
4 treatment, because you didn't answer the question, so  
5 I'm shooting in the dark here.

6 MS. KLEINHAUS: She told you about it all  
7 day today for several hours. I let her answer all of  
8 that, so you have all of that information.

9 MR. KNOTT: Do you understand why that  
10 would be even more distressing to me, that you  
11 objected to it and didn't give us the information,  
12 and then sitting here in a deposition you don't think  
13 that it's objectionable and I'm supposed to sit in a  
14 deposition without any records and take the  
15 deposition? I mean, if it was harassing when I sent  
16 these interrogatories, why isn't it harassing now?

17 MS. KLEINHAUS: I made an extensive record  
18 today about questions about drug use being harassing.  
19 In an effort to be efficient, I've also allowed some  
20 questions to be answered about drug use, and so you  
21 have that information.

22 MR. KNOTT: And is it your position that  
23 you will not provide authorizations for her  
24 counseling and therapy over the years?

25 MS. KLEINHAUS: Not unless there is some

1 proffer how it relates to this case.

2 MR. KNOTT: That's not how it works. We  
3 don't have to prove relevance to the plaintiff's  
4 counsel in order to get an authorization.

5 MS. KLEINHAUS: Okay. Well, in the  
6 interest of time, she has given you all the  
7 information she has.

8 MR. KNOTT: Yeah.

9 MS. KLEINHAUS: And now, you know, you  
10 disagree with my position. That's where we are.

11 MR. KNOTT: Yeah. Do you think it would  
12 have -- I don't agree that it's appropriate to stiff  
13 the defense counsel and then expect them to take a  
14 deposition without the benefit of any records, and  
15 then take the position that I should have been able  
16 to ask all the questions. I would like an agreement  
17 that you will provide appropriate authorizations for  
18 the treatment, and the deposition isn't going to be  
19 completed until we finish -- until we obtain the  
20 records and see what treatment she has been provided  
21 and the stressors she has had over her life.

22 BY MR. KNOTT:

23 Q Ms. Terry, if you could look at Interrogatory No. 3,  
24 your counsel took the position that your obstetric  
25 and gynecological treatment was irrelevant also

1 and --

2 MS. KLEINHAUS: Then we negotiated an  
3 agreement with you where she signed releases.

4 BY MR. KNOTT:

5 Q Okay. And the plaintiff has agreed to disclose  
6 medical records. I heard you say that you obtained  
7 reproductive health treatment at Planned Parenthood;  
8 is that correct?

9 A Yeah -- yeah, like annual testing type of thing.

10 Q I'm sorry?

11 A Like Pap smears.

12 Q And did you tell your counsel that?

13 MS. KLEINHAUS: Objection, calls for  
14 privileged information. You don't have to tell him  
15 about conversations you had with your attorney.

16 BY MR. KNOTT:

17 Q I will withdraw it.

18 When you looked at these interrogatories  
19 before signing them, did you -- did you think that --  
20 that someone other than Aurora healthcare should be  
21 listed as a response to healthcare providers you had  
22 seen since 2012?

23 A I'm sorry, can you say that one more time?

24 Q You looked at these interrogatory responses and  
25 signed them; correct?



1 A Correct.

2 Q And in the final sentence of the response to  
3 Interrogatory No. 3, it says, "Plaintiff believes she  
4 has seen healthcare providers through the Aurora  
5 Healthcare network since 2012"; right?

6 A Correct.

7 Q And that's not a complete statement we learned today  
8 during this deposition; right?

9 A Yes, I did say that I have gone to Planned Parenthood  
10 besides that.

11 Q Any other healthcare providers you have seen since  
12 2012 other than those in the Aurora Healthcare  
13 network and Planned Parenthood and the therapists and  
14 counselors that you have seen and the --

15 A No, not that I can think of.

16 Q I want to make sure before we complete the  
17 deposition, and I do have more questions, but I want  
18 to make sure that I have talked to you about all of  
19 the conversations you had with the jail staff on  
20 March 9 and March 10.

21 Do you think that we have exhausted that  
22 line of questioning and you have discussed with me  
23 everything you remember about those conversations?

24 A Yes, sir.

25 Q Was that "yes, sir"?

1 A Yes.

2 Q You don't have call me "sir," but --

3 A Just force of habit.

4 Q But the answer is yes.

5 You were -- I want to show you Exhibit 2.

6 You were arrested and incarcerated at the Milwaukee

7 County Jail in June of 2010; correct?

8 A That's sounds about right.

9 Q Was that the first time you had come to the Milwaukee  
10 County Jail?

11 A I believe so, yes.

12 Q And any reason to dispute this record, that you  
13 received a prompt mental health assessment?

14 MS. KLEINHAUS: Do you want to take a  
15 second and just review Exhibit 2 so you're familiar  
16 with it?

17 THE WITNESS: Yeah, I know what this is  
18 already. Yeah, I'm sorry, could you say your -- ask  
19 your question one more time.

20 BY MR. KNOTT:

21 Q On page 1 --

22 A Uh-huh.

23 Q -- if you look at appointment type, it says "Referral  
24 for psychiatric services."

25 A Yes.

1 Q And the note -- the second note indicates  
2 "psychiatric progress note." In all honesty, I'm not  
3 sure whether that is actually people interacting with  
4 you or whether they are reviewing records, but do you  
5 have any reason to doubt that you were assessed for  
6 psychiatric needs in June of 2010?

7 A No, I don't.

8 Q And it says you were -- had been prescribed Xanax at  
9 that time?

10 A Uh-huh.

11 Q "Yes"? Correct?

12 A Yes, that's --

13 Q If you turn to page 2 of the exhibit, it's actually  
14 630 at the bottom.

15 A Uh-huh.

16 Q It says -- and I'm looking at subjective. This is a  
17 booking note by an RN at 2:01 a.m. on June 18. It  
18 says, quote: I have a prescription for Xanax 1 to 2  
19 milligrams a day, but I don't take them that way. I  
20 took one two days ago and therefore last -- excuse  
21 me -- and before that last week sometime -- strike  
22 that. There is no periods in here. Let me stop  
23 there.

24 Do you recall that you had a prescription  
25 for Xanax in June 2010?

1 A I recall lying to the nurse that I had a prescription  
2 for Xanax, yes.

3 Q So you were not truthful with the nurse doing the  
4 booking assessment in 2010?

5 A No, that was -- again, that was, like you said, my  
6 first time in jail. And someone was like, oh, if you  
7 tell them that you take that, so it was basically  
8 drug seeking.

9 Q So you knew that Xanax was an anti-anxiety  
10 medication?

11 A Right.

12 Q And so you lied to the nurse that you had a valid  
13 prescription for Xanax?

14 A Right.

15 Q So that you could get Xanax in the jail; right?

16 A Right, because I was -- I was, yeah, trying to  
17 self-medicate because I felt anxious.

18 Q And you felt anxious -- did you have an anxiety  
19 condition before being brought to the jail in June of  
20 2010?

21 MS. KLEINHAUS: Objection to form, I'm  
22 sorry, and foundation. Go ahead.

23 THE WITNESS: I was told that I did, but  
24 later that doctor was proven to just give bogus  
25 diagnoses and stuff like that, so I never really -- I

1           was told -- yes, I was told that I had an anxiety  
2           disorder, but --

3       BY MR. KNOTT:

4       Q     When were you told that?

5       A     I don't know. A very long time ago.

6       Q     And who was that doctor?

7       A     Dr. Stephen Callaghan in Racine.

8       Q     And he prescribed you anti-anxiety medications?

9       A     He did at that time, but he also prescribed me ADHD  
10           medication.

11      Q     Okay.

12      A     Which I didn't have.

13      Q     And what was the -- and did you go to him seeking  
14           drugs?

15      A     No, I went to him seeking help.

16      Q     And he prescribed for you for conditions that you  
17           don't think you had?

18      A     No, and the reason I say that is because later I  
19           found out that that's what he gave 90 percent of his  
20           patients.

21      Q     What was the drug -- the ADHD drug?

22      A     Adderall.

23      Q     And did you take it?

24      A     I did.

25      Q     Did you sell it?

1 A No.

2 Q And what was the anti-anxiety medication that he gave  
3 you?

4 A It was Xanax.

5 Q And did you take that drug?

6 A I did. I would use -- I would have to take the  
7 Adderall to be awake and the Xanax to go to sleep  
8 until I just stopped taking everything.

9 Q And you said it was a long time ago. At what age?

10 A I -- my -- 22 to 24, maybe.

11 Q And how long did you take Xanax?

12 A I don't know, maybe six to eight months, and I just  
13 stopped taking both prescriptions.

14 Q And do you dispute today that you had an anxiety  
15 condition before March of 2014?

16 A A condition, yes. I don't believe I had an anxiety  
17 condition.

18 Q You periodically had anxiety?

19 A Yes.

20 Q And other than what Dr. Callaghan had prescribed, had  
21 you ever taken medications for that?

22 A No.

23 Q It says in the note, quote: I tried to hurt myself  
24 at age 13, 14, and 15. Is that truthful?

25 A That is.

1 Q Do you have any reason to doubt that your medical and  
2 mental health needs were attended to in the Milwaukee  
3 County Jail when you were arrested in June 2010?

4 A No.

5 Q Exhibit 3 are records from an arrest in May of 2011.  
6 Tell me when you've had an opportunity to review  
7 those.

8 A Uh-huh.

9 Q Is that --

10 A Sorry, I was reading. Sorry about that.

11 Q So I'm going to start.

12 A Go ahead.

13 Q Tell me when you're ready to talk.

14 A Go ahead.

15 Q Okay. I'm going to start at the back. On page 622,  
16 there is an oral health assessment. Do you remember  
17 having an assessment of your -- an oral screening  
18 evaluation in May of 2011?

19 A No, I don't. I don't remember specifically what this  
20 was.

21 Q Do you dispute that the nurse assessed your oral  
22 health needs in order to determine whether you needed  
23 dental care?

24 A I don't remember.

25 Q And the top of that page, this is 622, there is a

1 SOAP note. It's a booking note by an RN. It says,  
2 under subjective, "Inmate reports past psyche SISA as  
3 a teen." I think that my suicidal ideation and  
4 suicidal acts as a teen. Is that something you  
5 reported?

6 A Probably.

7 Q And it says in the plan, "Refer to a nurse  
8 practitioner, a dentist, psych social worker as  
9 needed."

10 Do you have any reason to dispute that an  
11 assessment was done and a plan was made to refer you  
12 for any needs you would have on that incarceration?

13 A No.

14 Q If you turn to page 621, there is a SOAP note  
15 indicating that your urine was tested and it was  
16 negative. Any reason to dispute that lab analysis of  
17 your urine was obtained on May 17, 2011?

18 A That it was obtained? Yes.

19 Q You have no reason to doubt that it was obtained;  
20 true?

21 A True, I -- true.

22 Q In fact, your urine is obtained and tested on each  
23 incarceration?

24 A Uh-huh.

25 Q And every incarceration; correct?



1 A Correct.

2 Q And you understand that to be so that your pregnancy  
3 or whether you're pregnant or not can be confirmed  
4 and healthcare referrals made based on whether you're  
5 found to be pregnant or not; right?

6 MS. KLEINHAUS: Objection; foundation,  
7 form. You can answer.

8 BY MR. KNOTT:

9 Q You know that to be true, don't you?

10 A That they give a urine test every time you come into  
11 jail?

12 Q Yeah.

13 A Yes.

14 Q And you know that's because they are trying to screen  
15 you to determine whether you have obstetric needs;  
16 true?

17 MS. KLEINHAUS: Objection; foundation. You  
18 can answer.

19 THE WITNESS: I just know that it's --  
20 yeah, to determine whether you're pregnant or not.

21 BY MR. KNOTT:

22 Q And turning to page 620 to 621, there is an  
23 assessment titled "psychiatric progress note." It  
24 looks like it's by a social worker. It says, "Seen  
25 in 14-day mental health assessment." Do you have any

1 reason to dispute that you were given a mental health  
2 assessment in May 2011?

3 MS. KLEINHAUS: I'm sorry, where are you  
4 for that?

5 MR. KNOTT: The carry-over page from 620 to  
6 621.

7 MS. KLEINHAUS: Okay. Sorry, go ahead.

8 THE WITNESS: No, I don't have any reason  
9 to doubt that.

10 BY MR. KNOTT:

11 Q And if you go to page 618, it looks like there is a  
12 longer note of that assessment by social worker  
13 Williams. It indicates that you were assessed on  
14 May 17; correct?

15 A Uh-huh.

16 Q "Yes"?

17 A Yes.

18 Q And it says on page 619: Do you have a mental health  
19 diagnosis? Answer: Yes, anxiety.

20 Was that truthful at that time?

21 A Yes. Uh-huh, yes.

22 Q And it indicates you were received -- that you had  
23 received META House substance abuse treatment in  
24 2011; correct?

25 A Correct.

1 Q On the carryover page from 617 to 618, there is  
2 another note by social worker Williams, and it  
3 indicates that you had submitted an inmate request  
4 form, I think, to speak to a psych social worker.  
5 Inmate described herself as very anxious. Inmate  
6 stated she has been trying to keep her anxiety under  
7 control by self talk.

8 Were you experiencing actual anxiety when  
9 you submitted a request form to see the psych social  
10 worker?

11 A Yes.

12 Q And the assessment was anxious and depressed. Is  
13 that an accurate assessment?

14 A Yes.

15 Q Any reason to dispute that?

16 A No.

17 Q Do you have any reason to dispute that your medical  
18 and mental health needs were met promptly in your  
19 arrest in June 2011?

20 A No.

21 MS. KLEINHAUS: Objection to form. Sorry I  
22 was late.

23 THE WITNESS: Sorry.

24 BY MR. KNOTT:

25 Q I'm going to show you Exhibit 4, which are records of

1 your arrest in August of 2013.

2 MS. KLEINHAUS: Do you have a copy?

3 MR. KNOTT: I'm sorry?

4 MS. KLEINHAUS: Do you have a copy?

5 MR. KNOTT: Oh, I'm sorry.

6 BY MR. KNOTT:

7 Q And Ms. Terry, I'm going to give you my pen, and I'm  
8 going to ask you to note the number of times you were  
9 seen and assessed during this admission.

10 In August of 2013, you were six weeks  
11 pregnant -- right? -- or eight weeks?

12 A Yes, I believe so.

13 Q And is it your testimony that before being arrested  
14 in August of 2013, you had gone and obtained an  
15 ultrasound?

16 A I believe so, yes.

17 Q And, again, working back to front, and there is a  
18 couple of screening notes, again, where the staff is  
19 looking at your record, but if we go to pages 611  
20 through 614, there is a health services admission  
21 screening.

22 Do you have any reason to doubt that you  
23 were promptly screened for health service needs on  
24 your admission to the jail in August of 2013?

25 A No, I do not.

1 Q And --

2 A Excuse me.

3 Q So would you put a "1" next to the assessment by  
4 Nurse Wigley, W-i-g-l-e-y, on page 611?

5 A Uh-huh.

6 Q Have you done that?

7 A I have.

8 Q And turn next to page 609.

9 A (Witness complies.) All right.

10 Q There is a -- at the bottom of the page there is  
11 vital signs taken.

12 Did you ever have vital signs taken by  
13 anybody but a nurse at the jail?

14 A No, not that I know of.

15 Q Could you put a "2" on page 609.

16 A Okay.

17 Q You reported allergies to iodine and shell fish.  
18 That's truthful; correct?

19 A Yes. Yes.

20 Q So we know she interviewed you?

21 A Yes.

22 Q Page 608, Nurse Wigley did a clinical narcotic opiate  
23 withdrawal scale?

24 A Okay.

25 Q And it looks like that was the same assessment as you

1 had -- at the same time as page 611. Did you receive  
2 an oral health assessment?

3 A I don't know.

4 Q On page 607 --

5 MS. KLEINHAUS: I guess I'd like to have a  
6 standing objection to all questions about this  
7 exhibit so I don't have to interrupt. I mean, she is  
8 obviously not any more skilled at reading medical  
9 records than anyone else. She is not an expert in --

10 MR. RUSSART: Do you have a legal  
11 objection? Do you have a legal objection?

12 MS. KLEINHAUS: I'm just --

13 MR. RUSSART: I'm just trying to  
14 demonstrate to you how foolish it is when you  
15 interrupt us and make that comment, but go ahead, I  
16 want you to make a record.

17 MS. KLEINHAUS: I'd just like to make a  
18 standing objection. She doesn't have any expertise  
19 on medical records. Go ahead.

20 MR. KNOTT: She is making a claim that she  
21 didn't -- that there is a policy or practice of not  
22 providing healthcare at the Milwaukee County Jail, so  
23 I'd like to have her recollection as to whether, in  
24 fact, that's a truthful allegation or not.

25

1 BY MR. KNOTT:

2 Q Ms. Terry, do you believe it's the policy of the  
3 Milwaukee County Jail to not provide healthcare?

4 MS. KLEINHAUS: Just object to the extent  
5 it calls for a legal conclusion, but you can answer.

6 MR. RUSSART: Is that a form objection?

7 MS. KLEINHAUS: No, it's an objection to  
8 the extent it calls for a legal conclusion. That's  
9 why I stated that is my objection.

10 THE WITNESS: My answer to that question is  
11 I don't necessarily think that Milwaukee County Jail  
12 doesn't provide healthcare. I don't believe that  
13 they provide prompt emergency care.

14 BY MR. KNOTT:

15 Q Do you have personal knowledge of anyone's care other  
16 than your own?

17 MS. KLEINHAUS: Objection to form. You can  
18 answer.

19 MR. RUSSART: What's wrong with the form?  
20 What's wrong with the form so we can correct it.

21 MS. KLEINHAUS: I'm not -- we have got to  
22 get out of here. I'm not going to do this argument  
23 with you. That's my objection, I'm entitled to make  
24 my objection, and she still has to answer, and I told  
25 her she can answer.

1 MR. RUSSART: We have got to go off the  
2 record here for a minute.

3 MS. KLEINHAUS: No, I'm not going off the  
4 record. I'm not.

5 MR. RUSSART: Well, excuse the witness.

6 MS. KLEINHAUS: Okay. Please step out in  
7 the hallway.

8 THE WITNESS: May I use the bathroom?

9 MS. KLEINHAUS: Yeah, sure.

10 (Witness excused.)

11 MR. RUSSART: I think you know that the  
12 only two objections that are allowed at a deposition  
13 are form and foundation. And the reason is, because  
14 those can't be corrected later.

15 So if there is a form objection, it's  
16 within the right for the lawyer to ask what's the  
17 form objection so that they can correct the form  
18 error. Foundation same thing. If there is a  
19 foundation objection, they can then lay the  
20 foundation. So because this question is important to  
21 Mr. Knott and myself, I would like to know what the  
22 form objection is so it can be corrected.

23 MS. KLEINHAUS: I'm not required to tell  
24 you the problems that I have with the question. What  
25 I'm required to do is lodge my objection on behalf of



1 my client, so that's what I'm going to do.

2 MR. RUSSART: Okay.

3 MR. KNOTT: Well, to the extent it's  
4 necessary, I agree with Mr. Russart, that if there is  
5 a problem with the form, I do think you are  
6 obligated, if called out, to tell me what it is so  
7 that I can correct it.

8 MR. RUSSART: And as long as the witness  
9 isn't here, could I hear Mr. Knott's question read  
10 back?

11 (Requested portion of record read by the  
12 reporter.)

13 MS. KLEINHAUS: Okay. Shall I get the  
14 witness?

15 MR. KNOTT: Sure.

16 (Requested portion of record read by the  
17 reporter.)

18 MR. KNOTT: Ms. Court Reporter, could you  
19 please read back the question?

20 (Question read aloud by reporter.)

21 MS. KLEINHAUS: Same objection. Go ahead.

22 THE WITNESS: I know that other experiences  
23 that I had while I was in a jail was why I was afraid  
24 to have the baby in the jail, and that's why I went  
25 on the run so that I didn't have to have the baby in

1 jail, because I had seen other people miscarry in  
2 jail, I have seen people fall and crack their head  
3 open in jail. These are things that I have seen.  
4 Yes, and there was people calling for help and taking  
5 all night for help to get there. These are things  
6 that I witnessed with my own eyes.

7 So yes, I have seen this happen, where they  
8 don't get emergency medical care in an emergency, not  
9 promptly.

10 BY MR. KNOTT:

11 Q So your concern over the care at the jail led you to  
12 go on the run so that you wouldn't be arrested and  
13 brought to the jail; right?

14 MS. KLEINHAUS: Objection.

15 BY MR. KNOTT:

16 Q That's what you said; right?

17 MS. KLEINHAUS: Objection; mischaracterizes  
18 testimony and argumentative.

19 BY MR. KNOTT:

20 Q Did you not --

21 MS. KLEINHAUS: You can answer.

22 BY MR. KNOTT:

23 Q Did you not say you went on the run to avoid being  
24 arrested and brought to the jail?

25 A To have the baby in jail, yes. I -- that's -- when

1 we were speaking earlier, when you were asking me did  
2 I do things in a way to avoid being arrested, and you  
3 said was it to -- so you didn't have to go to jail.  
4 And I said, no, it was so I didn't have to have the  
5 baby in jail, and that's the same thing I'm saying  
6 here.

7 Q Okay. I want to talk to you about your own  
8 healthcare, and so far I think we have been -- this  
9 is your third admission to the jail, and I have not  
10 heard of any need that you had that was not attended  
11 to promptly in those two admissions and now we're  
12 working on the third; okay?

13 Am I correct in characterizing the  
14 admissions, that you were given prompt attention and  
15 care for psychiatric and mental health needs in June  
16 of 2010 and May 2011; correct?

17 A Yeah, up to everything we have reviewed, yes.

18 Q And you have no recollection of any other needs that  
19 were -- that you had that were not addressed at those  
20 times; right?

21 A I'm sorry, were you looking back, was that -- that  
22 was in these ones; right?

23 Q Yes.

24 A The mental health? Okay. Yeah, I did, within a few  
25 days of me dropping a slip they came and checked my

1           mental health.

2       Q     Dropping a slip?

3       A     Yeah.

4       Q     Okay. And you had -- let's go back to exhibit --  
5           what's the exhibit for August of 2013?

6                       MS. KLEINHAUS: 4.

7                       THE WITNESS: Okay.

8                       MR. KNOTT: Thanks.

9       BY MR. KNOTT:

10      Q     Page 606. There is an assessment by Nurse Wigley.  
11           It says, "Inmate reports being eight weeks pregnant.  
12           Inmate reports using heroin daily."

13                       Do you have any reason to dispute that you  
14           were assessed on the day that you were arrested in  
15           August of 2013 by Nurse Wigley?

16      A     No.

17      Q     And she created a plan to deal with the fact that you  
18           were eight weeks pregnant and that had you had a  
19           potential for opiate withdrawal. Do you have any  
20           reason to dispute that?

21      A     No.

22      Q     And under plan, it says she consulted with Dr. Gable  
23           and received an order to initiate opiate withdrawal  
24           monitoring and house in infirmary for 24 hours until  
25           seen by M.D.

1 Do you have any reason to dispute that you  
2 were monitored for opiate withdrawal in the infirmary  
3 or SMU in August of 2013?

4 A That's correct.

5 Q And do you have any reason to dispute that the next  
6 line says "WHNP," which I will represent to you means  
7 "women's health nurse practitioner, appointment  
8 made." I think is what was indicated there.

9 A Right.

10 Q Do you have any reason to dispute that a referral to  
11 a women's health specialist was made promptly?

12 A That -- yeah, that's what that says.

13 Q Yes, and I think if you turn to the -- we will get  
14 there.

15 Go to page 605.

16 A (Witness complies.) Am I still marking these pages  
17 off?

18 Q Yeah.

19 A What are we at, on three?

20 Q I think that -- in all honesty, I think that Nurse  
21 Wigley was documenting several different forms, so  
22 those were all within about an hour of you getting  
23 there?

24 A Okay.

25 Q So I'm going to leave that as one assessment.

1 A Okay.

2 Q But if you turn to page 605, you were seen at  
3 10:46 p.m. in the special medical unit by a nurse,  
4 Cheryl Wenzel. Do you see that?

5 A Uh-huh.

6 Q "Yes"?

7 A Yes, I do. I'm sorry.

8 Q Okay. And I think that's a second assessment, so if  
9 you would put a "2" there I would appreciate it.

10 A Okay.

11 Q And it states that the inmate is eight weeks pregnant  
12 and has been pregnant 13 times with one live birth.

13 Is that something you said?

14 A Yes.

15 Q Has anyone ever explained to you why you have had  
16 multiple miscarriages?

17 A No.

18 Q Have you had an ectopic pregnancy?

19 A Yes.

20 Q Was that your first pregnancy?

21 A No.

22 Q Did you require surgery for the ectopic pregnancy?

23 A I did.

24 Q Did you ever require any other sort of gynecological  
25 procedures or surgeries?

1 A I'm sorry?

2 Q Did you ever require any other gynecological  
3 procedures other than related to childbirth?

4 A No. Other than related to childbirth, no. I mean, a  
5 D & C, but that's still related to childbirth;  
6 correct?

7 Q And how often did you have that procedure?

8 MS. KLEINHAUS: Objection to form.

9 THE WITNESS: I guess I have had -- I don't  
10 know, at least ten times.

11 BY MR. KNOTT:

12 Q And those were the result of spontaneous  
13 miscarriages?

14 A Yes. I'm sorry, ten -- no, I probably had -- sorry,  
15 I'm getting tired and frustrated, just like you guys  
16 are. Probably seven or eight times for the D & C.

17 Q You told Nurse Wenzel that you weren't really feeling  
18 sick from heroin withdrawal at that time; correct?

19 A Uh-huh.

20 Q "Yes"?

21 A Yes.

22 Q It says you hadn't eaten for several days. Do you  
23 have any reason to doubt that that's what you told  
24 her?

25 A No.

1 Q It says you had chills at night and was in the ER at  
2 Wheaton and was diagnosed with UTI and STD and was  
3 given prescription for medicine, but didn't start  
4 taking it yet. Do you recall that?

5 A Yes.

6 Q And did you ever obtain treatment in 2013/2014 for an  
7 STD?

8 A Yes.

9 Q And where did you obtain that treatment?

10 MS. KLEINHAUS: Just object to the extent  
11 that this is harassing, but go ahead and answer.

12 THE WITNESS: I don't -- I don't remember.

13 BY MR. KNOTT:

14 Q The --

15 A I mean it says here "Wheaton," but I don't remember  
16 specifically.

17 Q The -- this to be clear, this is the pregnancy that  
18 we're talking about in this litigation; right?

19 A Yes.

20 Q And you were diagnosed with an STD and a UTI during  
21 the course of that pregnancy?

22 A Right in the beginning, yes.

23 Q So if you were recommended treatment, you would have  
24 obtained that treatment; right?

25 A Yes. I -- yes.



1 Q It looks like you were assessed at 1:14 a.m. in the  
2 SMU by a nurse on page 604; right?

3 A I'm sorry, you said 1:14?

4 Q Yeah.

5 A Yes.

6 Q And can you put a number next to that?

7 A I was at four; right? Three? Uh-huh.

8 Q And if you page between 603 and 604, I will represent  
9 to you that that is the nurse at 1:00 o'clock or 1:15  
10 in the morning doing a withdrawal assessment.

11 A Uh-huh.

12 Q And taking your vital signs. Do you have any reason  
13 to dispute that that occurred?

14 A I do not.

15 Q Do you have any complaint with how your symptoms of  
16 withdrawal were dealt with in August of 2013 at the  
17 Milwaukee County Jail?

18 A No.

19 Q On page 601, there was an assessment done at  
20 11:49 a.m. It's an assessment on August 3rd at about  
21 noon. It says you're reporting withdrawing from  
22 heroin with new symptoms. It says: Inmate reports  
23 using heroin daily, was going to the Methadone Clinic  
24 on 16th Street when arrested, had cocaine on person.

25 Were those true statements?

1 A Yes.

2 Q What's the Methadone Clinic on 16th Street?

3 A I'm sorry?

4 Q What's the Methadone Clinic on 16th Street? Do you  
5 know the name?

6 A No. That's what I thought it was called, was the  
7 Methadone Clinic on 16th Street.

8 Q I'm sorry, you have to be a little louder.

9 A That's what I thought the Methadone Clinic was  
10 called. The Methadone Clinic on 16th Street.

11 Q We haven't talked about that previously?

12 A That was the Methadone treatment I was talking about.

13 Q If you look at page 600 -- I'm sorry, did you put a  
14 note next to the note on -- did you put a number next  
15 to the note on 601?

16 A (Witness complies.) Okay. And then you said  
17 page 6 --

18 Q 600, at about 2:00 in the afternoon on August 3rd,  
19 you were given a medical evaluation by Dr. Thomas  
20 Gable. Any reason to dispute that?

21 A No.

22 Q And it says that you came into the facility  
23 yesterday, prior to booking seen at hospital and had  
24 ultrasound done confirming pregnancy, eight weeks.

25 Does that refresh your recollection as to

1           whether your ultrasound was done in association with  
2           being booked into the jail?

3       A     I -- I don't -- I mean, yeah, I had -- I don't think  
4           that I had the ultrasound at jail. Is that what  
5           you're asking me?

6       Q     I'm not asking you --

7       A     I'm sorry.

8       Q     -- if you had it at the jail.

9                       I'm asking you, if when you were arrested  
10           on August 3rd you were transported to a hospital in  
11           order to obtain an ultrasound to confirm your  
12           pregnancy at eight weeks?

13      A     No, the -- the -- because it was Cudahy that  
14           transported me. It was to make sure that -- because  
15           I told them that I was a daily heroin user and it was  
16           to make sure that -- to clear me, basically, was what  
17           my understanding was why they took me to the  
18           hospital.

19      Q     So you were arrested in Cudahy?

20      A     Uh-huh.

21      Q     "Yes"?

22      A     Yes.

23      Q     And they took you -- the Cudahy police took you to a  
24           hospital?

25      A     Eventually, yes.

1 Q And did you first arrive at the Milwaukee County Jail  
2 before being taken to the hospital?

3 A No, after being taken to the hospital.

4 Q So the Cudahy --

5 A Twice.

6 Q -- Police took you to the hospital for an assessment  
7 to be cleared for admission to the Milwaukee County  
8 Jail; correct?

9 A I'm not sure it was to be brought to Milwaukee County  
10 Jail or not. I ended up going to the hospital twice  
11 while I was in Cudahy's custody.

12 Q But if this note is correct, it was one day before  
13 you were seen by Dr. Gable, you had been at a  
14 hospital and had an ultrasound done confirming a  
15 pregnancy; correct?

16 A Correct.

17 Q So whether it was done by the Milwaukee County Jail  
18 or the Cudahy Police, you had prompt attention to  
19 that medical need in August 2013; agree?

20 A Agreed.

21 Q And did you put a number next to your assessment by  
22 Dr. Gable on August 3rd?

23 A Okay.

24 Q And turn to page 599.

25 A (Witness complies.)

1 Q There is an assessment at 10:21 by a Nurse Bevenue,  
2 B-e-v-e-n-u-e; do you see that?

3 A Yes.

4 Q Can you put a number next to it?

5 A Certainly.

6 Q Do you remember Nurse Bevenue?

7 A I do not.

8 Q Do you know if you ever interacted with Nurse Bevenue  
9 at any other time?

10 A The name sounds familiar, but I don't know.

11 Q You have no reason to think that she disliked you or  
12 had anything against you, do you?

13 A No.

14 Q If you turn to page -- did you put a number next to  
15 Bevenue's assessment?

16 A The one that we just went over?

17 Q Yeah.

18 A Okay.

19 Q Page 597.

20 A Okay.

21 Q There is an opiate withdrawal assessment and SOAP  
22 note by a nurse on August 4. Could you put a number  
23 next to that?

24 A Uh-huh, yes.

25 Q If you look at page 596, I think it's the same

1           assessment, it says: I feel okay. My legs are  
2           bothering me. They hurt.

3       A     Yes, I see that.

4       Q     Is that something that occurred when you were  
5           withdrawing from heroin, that your legs would hurt?

6       A     Yes.

7       Q     If you look at page 594, there is an assessment by a  
8           nurse named Margie Burton, B-u-r-t-o-n. If you  
9           carryover from page 594 to 595, it appears that she  
10          did an assessment and planning for you.

11                           Do you agree?

12      A     Yes.

13      Q     And one of the things it says in the plan is that she  
14           was going to get a request for information completed  
15           and faxed to the 10th Street Clinic. Is that another  
16           facility?

17      A     The 10th Street Clinic would be what I was thinking  
18           16th Street Clinic.

19      Q     So you think those are two different facilities?

20      A     No, it's the same facility.

21      Q     And which one is it?

22      A     10th Street. Sorry, maybe I made a mistake or it was  
23           a typo and I wasn't remembering it correctly, but now  
24           that I'm seeing 10th Street, that's where it's at,  
25           it's off of 10th and Layton.

1 Q Did you put a number next to Ms. Burton's assessment?

2 A Yes.

3 Q What assessment -- what's the number?

4 A 9.

5 Q Page 591, there was an opiate withdrawal assessment  
6 done by a nurse at 5:36 on August 4; correct?

7 A Correct.

8 Q Would you put a number next to it?

9 A Yes. Yes.

10 Q Thank you. Page 589, there is a nursing assessment  
11 done on August 5. Any reason to dispute that?

12 A No.

13 Q And I think her note carries over from 588 to 589.  
14 And it says your "stomach is cramping a little bit  
15 and my legs are a little achy." Are those both  
16 things that you experienced when you were withdrawing  
17 from heroin?

18 A Yes.

19 Q Yes?

20 A Yes.

21 Q Did you put a number next to that note?

22 A (Witness complies.) Okay.

23 Q Page 587.

24 A I thought that's the page we were on. Okay.

25 Q August 5, you were seen by Nurse Burton again?

1 A Uh-huh.

2 Q And you reported that you have no complaints?

3 A Okay. I see that.

4 Q Did you put a number?

5 A I did.

6 Q I want you to go to page 579.

7 A (Witness complies.)

8 Q This is a women's health note. Do you know what that  
9 means?

10 A No.

11 Q There is a nurse practitioner named Pamela Prince.  
12 Do you know that name?

13 A Yes.

14 Q Is that the women's health nurse practitioner that  
15 you referred to earlier?

16 A It was.

17 Q And you saw her enough where she became familiar to  
18 you?

19 A Correct.

20 Q And did she seem to be attentive to your needs?

21 A Yes.

22 Q And you understand that you were referred to her for  
23 an assessment because you were confirmed to be  
24 pregnant in August of 2013?

25 A Yes.



1 Q And if you look at page 580, in the comments, it  
2 says: Client states she has not been on Methadone  
3 since July 1st, but found out she was pregnant at  
4 Planned Parenthood and thought she was needed to get  
5 back on because she was pregnant.

6 Is that something that you told Nurse  
7 Practitioner Prince?

8 A That sounds about right, yes.

9 Q So this says you found out that you were pregnant  
10 with the pregnancy at issue at Planned Parenthood;  
11 correct?

12 A Correct.

13 Q And if you look at the plan under "comments," it  
14 says, "Advise the client that the writer, Pam, will  
15 call her over for prenatal visit later today."

16 Do you remember that occurring?

17 A I don't remember.

18 Q In here, in her assessment, and you can look at it on  
19 page 579, it says, "The client does not want to  
20 restart Methadone."

21 A Correct.

22 Q You were offered Methadone in order to deal with your  
23 heroin withdrawal; correct?

24 A Correct.

25 Q And you elected not to have that treatment; right?

1 A Correct.

2 Q Did you put a number by that assessment by Nurse  
3 Practitioner Prince?

4 A I can, yup.

5 Q I think it starts --

6 A Yeah, I was going to say hold on one second, let me  
7 go back, I forgot what number I was on.

8 Q I think it starts on 579.

9 A Okay. All right. I got it.

10 Q And it says that she was going to -- in the earlier  
11 note it said that she was going to have you come over  
12 to the clinic for another assessment and at page 576  
13 it appears that she did that. Do you agree?

14 A I agree.

15 Q Did you put a number next to that assessment?

16 A (Witness complies.) Okay.

17 Q Page 575, there is an assessment by Dr. Gable.

18 A On 575 you said?

19 Q 575 carrying over to 576.

20 A Okay.

21 Q Did he talk to you also about your pregnancy and  
22 whether you wanted to start Methadone?

23 A I don't remember.

24 Q It says that in the P section on 576, it says  
25 "Outside OB follow to be scheduled."

1 Do you remember being told that an  
2 assessment by an outside OB would be scheduled for  
3 you?

4 A No.

5 Q Did you ever have -- were you ever transported by the  
6 Milwaukee County Jail for an outside OB assessment?

7 A I don't think so.

8 Q Did you put a number next to Dr. Gable's assessment?

9 A I'm trying to find his name. You said that's on 576?

10 Q Yes, it's the first line on 576.

11 A Oh, I see it, thank you.

12 Q 574, you saw Nurse Practitioner Prince again?

13 A Okay.

14 Q Did you put a number there?

15 A Yes, I did.

16 Q Also on 574, there is a reference to a Nurse  
17 Practitioner Young. And, again, I don't think she  
18 saw you.

19 A Okay.

20 Q Do you remember a Nurse Practitioner Young?

21 A I don't.

22 Q Page 573, Nurse Practitioner Prince placed a call to  
23 the Methadone Clinic to discuss you. Do you have any  
24 reason to dispute that that occurred?

25 A I'm sorry?

1 Q Nurse Practitioner Prince placed a call to the  
2 Methadone Clinic to discuss you.

3 A Okay.

4 Q Do you recognize the name Betty Rivers, RN?

5 A I don't recall the name, no.

6 Q Do you have any reason to doubt that Nurse  
7 Practitioner Prince called the Methadone Clinic to  
8 discuss you, your pregnancy, and the use of  
9 Methadone?

10 A No.

11 Q On page 572, the first page, you were assessed for  
12 opiate withdrawal on August 5 by a nurse.

13 A Okay.

14 Q Did you -- could you put a number next to that  
15 assessment?

16 A All right.

17 Q So it looks like you were in the jail from August 2  
18 until August 5 in 2013?

19 A Correct.

20 Q And how many times were you seen and assessed?

21 A Seventeen.

22 Q Do you agree with me that that was vigilant attention  
23 to your needs on that incarceration?

24 MS. KLEINHAUS: Objection to form,  
25 foundation. You can answer.

1 THE WITNESS: Yes.

2 BY MR. KNOTT:

3 Q Do you have any needs related to your pregnancy that  
4 weren't addressed on that admission?

5 A No.

6 MR. KNOTT: We can go off the record.

7 THE VIDEOGRAPHER: Going off the record at  
8 6:30 p.m.

9 (Off the record.)

10 THE VIDEOGRAPHER: We're back on the record  
11 at 6:32 p.m.

12 MS. KLEINHAUS: The statements that we were  
13 making before about whether we're going to continue,  
14 our position is that we have to complete the  
15 deposition today. I told you in advance I couldn't  
16 start until noon and said you could pick another day  
17 if you wanted to start earlier, and you elected to  
18 proceed today.

19 Our position is that it needs to be  
20 completed today. I know we have an ongoing  
21 contentious disagreement about questions related to  
22 drug use after this incident. Our position is the  
23 same, that we don't believe that that's relevant to  
24 damages, and it's something that we will have to take  
25 up with the court for a protective order.

1 MR. RUSSART: And the court reporter off  
2 the record indicated that she has a personal  
3 commitment, family commitment, that she would like to  
4 be able to keep. And if we keep going, it's not  
5 going to happen for her. She is not going to be able  
6 to keep it. Off the record, Doug asked as a courtesy  
7 whether we could adjourn the deposition to  
8 accommodate the court reporter. And Ms. Kleinhaus  
9 said no, basically that's her problem.

10 So -- basically. And so I think that it  
11 makes sense to adjourn the deposition. I don't know  
12 why your client couldn't be produced for the  
13 remainder of this seven hours, that we're going to  
14 take all seven hours.

15 MS. KLEINHAUS: I just have to clarify,  
16 I -- I informed you ahead of time I couldn't start  
17 until noon. If when you booked a court reporter, the  
18 thing to do would have been to explain that this is  
19 starting at noon so it could proceed well into the  
20 evening, but it was never my intention to interrupt  
21 anyone's plans, but it's on you to book the court  
22 reporter, and I told you when I could start and I  
23 offered to do it a different day.

24 MR. KNOTT: You didn't offer me any other  
25 days --

1 MS. KLEINHAUS: Excuse me --

2 MR. KNOTT: You didn't offer any other days  
3 before the summary judgment deadline.

4 MS. KLEINHAUS: You didn't ask for a  
5 deposition of our client until within --

6 MR. KNOTT: That's not true.

7 MS. KLEINHAUS: -- two weeks of the summary  
8 judgment deadline.

9 MR. KNOTT: That's not true.

10 MS. KLEINHAUS: Well, you wrote me and  
11 asked me about two dates. One was like May 31st, the  
12 other was like June 1. I said I could do June 1, but  
13 I have a doctor's appointment in the morning, so I  
14 would have to start at noon, if you want to pick  
15 another day let me know. And then I didn't hear  
16 anything. Then I followed up with you: Are we going  
17 on June 1st. Yes, we are. So that's how we're in  
18 this situation right now.

19 MR. KNOTT: My position is it's about  
20 90 percent certain that we're going to be back here  
21 to complete the deposition after we have been given  
22 appropriate authorizations, received records, and  
23 have a ruling on the questions in which you directed  
24 the plaintiff not to answer.

25 So I think it's a practical solution to

1 allow the court reporter to have her personal life.

2 MS. KLEINHAUS: I'm not terminating it, but  
3 if you're terminating it, then you can say that and  
4 take that position.

5 MR. RUSSART: You're not agreeing to  
6 reproduce her voluntarily, there will have to be a  
7 court order is what you're saying?

8 MS. KLEINHAUS: That's right, I told you I  
9 produce her once, today's the date you picked, we're  
10 here, we're prepared to answer questions, that's the  
11 situation.

12 MR. RUSSART: So on what authority are you  
13 relying in saying that, because I have heard that  
14 from your office so many times. On what authority  
15 are you relying that you only have to produce her on  
16 one occasion?

17 MS. KLEINHAUS: Under the rules, you have  
18 seven hours of deposition. You asked about doing it  
19 over more than one day. We had this discussion over  
20 email. I said I'm not doing it over more than one  
21 day. I'm doing it one day.

22 MR. RUSSART: So you don't have any  
23 authority.

24 MS. KLEINHAUS: So Rule 30, one day of  
25 seven hours.



1 MR. RUSSART: It doesn't say one day, it  
2 says seven hours.

3 MS. KLEINHAUS: Well, you don't get to  
4 terminate -- if your proposition were true, you could  
5 do seven days of an hour apiece, if we wanted to do  
6 it that way. We're not doing it that way.

7 MR. RUSSART: We're not asking to do it  
8 that way, and we're proposing something that's  
9 reasonable and logical. I'm not sure that you  
10 understand.

11 MR. KNOTT: And decent. I have got to take  
12 a break.

13 MS. KLEINHAUS: I told you ahead of time,  
14 I'm not trying to inconvenience her. I assumed you  
15 would arrange for a court reporter that could stay  
16 into the evening given that you wanted to start at  
17 noon, and I resent the implication that I am causing  
18 this problem. I told you ahead of time I couldn't  
19 start until noon. I told you that.

20 MR. KNOTT: Well, we lost about an hour  
21 when you instructed the witness not to answer the  
22 third question, which clearly would pertain to her  
23 damages, so I think --

24 MS. KLEINHAUS: It is my obligation to  
25 direct her not to answer if I think something is

1 harassing and not discoverable. So you may disagree  
2 about how I'm doing it, you may take a different  
3 position, but that is my job.

4 MR. RUSSART: We would be an hour ahead of  
5 things right now if that didn't happen I think was  
6 Mr. Knott's point. Anyway, we can go off the record  
7 so Mr. Knott can take his break.

8 THE VIDEOGRAPHER: Going off the record at  
9 6:38 p.m.

10 (Off the record.)

11 THE VIDEOGRAPHER: We're back on the  
12 record. It's 6:44 p.m.

13 MR. KNOTT: We took a break and I have  
14 probably 45 minutes to an hour from completion. The  
15 court reporter has informed us that it's not only a  
16 personal matter, but it's her own child's graduation  
17 party that we're 15 minutes from.

18 I don't think that we're going to complete  
19 the deposition tonight, and I don't think -- and  
20 that's because we haven't been given records, and we  
21 were -- and questions clearly pertaining to damages  
22 were not answered at the instruction of counsel, so I  
23 want to -- I'm going to cease questioning and will  
24 likely have to address this with the court is my  
25 understanding.

1 I would ask for your agreement to  
2 reschedule, allow us to have the records, and allow  
3 your witness to answer questions pertaining to  
4 damages.

5 MS. KLEINHAUS: Okay. I won't repeat  
6 myself, so I think my position is clear, so we're not  
7 agreeing to that.

8 MR. RUSSART: I'll correct the record --

9 MS. KLEINHAUS: Can you just --

10 MR. RUSSART: -- Ms. Kleinhaus was --

11 MS. KLEINHAUS: Let me finish.

12 MR. RUSSART: -- correct that the  
13 deposition is limited to one day and 7 hours. I  
14 didn't know you were --

15 MS. KLEINHAUS: Okay. When I say "let me  
16 finish," that means I'm not done, but I understand  
17 now we are done, and I would like our court reporter  
18 to be able to go since that's your decision to  
19 terminate it, so we will go off the record.

20 THE VIDEOGRAPHER: Going off the record at  
21 6:45.

22 (Whereupon, the proceedings concluded at  
23 6:45 p.m.)  
24  
25

1 STATE OF WISCONSIN )  
2 ) SS:  
3 MILWAUKEE COUNTY )

4 I, Carla J. Van Roo, Registered  
5 Professional Reporter and Notary Public in and for  
6 the state of Wisconsin, do hereby certify that I have  
7 carefully compared the foregoing pages with my  
8 stenographic notes, and that the same is a true and  
9 correct transcript.

10 I further certify that I am not a relative  
11 or employee or attorney or counsel of any of the  
12 parties, or a relative or employee of such attorney  
13 or counsel, or financially interested directly or  
14 indirectly in said action.

15 Dated at Milwaukee, Wisconsin, on this  
16 \_\_\_\_\_ day of \_\_\_\_\_, 2018.

17  
18 \_\_\_\_\_  
19 Carla J. Van Roo  
20 Registered Professional Reporter  
21 Certified Realtime Reporter  
22 Notary Public  
23  
24  
25

My commission expires May 15, 2019

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